

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No.  
17-md-2804

Judge Dan Aaron  
Polster

This document relates to:

The County of Cuyahoga v. Purdue Pharma, et  
al., Case No. 17-OP-45004

City of Cleveland, Ohio v. Purdue Pharma L.P.,  
et al., Case No. 18-OP-45132

The County of Summit, Ohio, et al. v. Purdue  
Pharma L.P., et al., Case No. 18-OP-45090

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Videotaped Deposition of  
MATTHEW PAOLINO  
December 5, 2018  
9:02 a.m.

Taken at:  
Akron Bar Association  
57 South Broadway Street  
Akron, Ohio

Stephen J. DeBacco, RPR

<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES:</p> <p>2</p> <p>3 On behalf of the City of Akron and Summit</p> <p>4 County:</p> <p>5 Motley Rice LLC, by</p> <p>6 JAMES W. LEDLIE, ESQ.</p> <p>7 CAROLINE RION, ESQ.</p> <p>8 JODI WESTBROOK FLOWERS, ESQ.</p> <p>9 28 Bridgeside Boulevard</p> <p>10 Mt. Pleasant, South Carolina 29464</p> <p>11 (843) 216-9252</p> <p>12 jledlie@motleyrice.com</p> <p>13 (843) 216-9168</p> <p>14 crion@motleyrice.com</p> <p>15 (843) 216-9163</p> <p>16 jflowers@motleyrice.com</p> <p>17</p> <p>18 On behalf of McKesson Corporation:</p> <p>19 Covington &amp; Burling LLP, by</p> <p>20 BENJAMIN C. BLOCK, ESQ.</p> <p>21 One CityCenter</p> <p>22 850 Tenth Street Northwest</p> <p>23 Washington, D.C. 20001-4956</p> <p>24 (202) 662-5205</p> <p>25 bblock@cov.com</p> <p>26 -and-</p> <p>27 Covington &amp; Burling LLP, by</p> <p>28 BRYANT E. PULSIPHER, ESQ.</p> <p>29 One Front Street</p> <p>30 San Francisco, California 94111-5356</p> <p>31 (415) 591-7055</p> <p>32 bpulsipher@cov.com</p> <p>33</p> <p>34 On behalf of Walgreens:</p> <p>35 Bartlit Beck LLP, by</p> <p>36 MATTHEW BREWER, ESQ.</p> <p>37 54 West Hubbard Street</p> <p>38 Chicago, Illinois 60654</p> <p>39 (312) 494-4432</p> <p>40 batthew.brewer@bartlitbeck.com</p> <p>41 ~ ~ ~ ~ ~</p>	<p style="text-align: right;">Page 4</p> <p>1 APPEARANCES, Continued:</p> <p>2</p> <p>3 On behalf Endo Health Solutions, Inc.,</p> <p>4 and Endo Pharmaceuticals, Inc., and Par</p> <p>5 Pharmaceuticals, via teleconference:</p> <p>6</p> <p>7 Arnold &amp; Porter Kaye Scholer LLP, by</p> <p>8 HEATHER A. HOSMER, ESQ.</p> <p>9 601 Massachusetts Avenue Northwest</p> <p>10 Washington, D.C. 20001-3743</p> <p>11 (202) 942-6208</p> <p>12 heather.hosmer@arnoldporter.com</p> <p>13</p> <p>14 On behalf of Cephalon, Inc.; Teva</p> <p>15 Pharmaceuticals USA, Inc.; Actavis, LLC;</p> <p>16 Actavis Pharma, Inc. f/k/a Watson Pharma,</p> <p>17 Inc.; and Watson Laboratories, Inc., via</p> <p>18 teleconference:</p> <p>19</p> <p>20 Morgan, Lewis &amp; Bockius LLP, by</p> <p>21 ZACHARY R. LAZAR, ESQ.</p> <p>22 77 West Wacker Drive</p> <p>23 Chicago, Illinois 60601-5094</p> <p>24 (312) 324-1492</p> <p>25 zachary.lazar@morganlewis.com</p> <p>26</p> <p>27 On behalf of AmerisourceBergen Drug</p> <p>28 Corporation:</p> <p>29 Reed Smith LLP, by</p> <p>30 CHRISTIAN W. SAUCEDO, ESQ.</p> <p>31 Three Logan Square</p> <p>32 1717 Arch Street, Suite 3100</p> <p>33 Philadelphia, Pennsylvania 19103</p> <p>34 (215) 241-5492</p> <p>35 csaucedo@reedsmith.com</p> <p>36 ~ ~ ~ ~ ~</p> <p>37 ALSO PRESENT:</p> <p>38 Shaun Crum, Legal Videographer</p> <p>39 ~ ~ ~ ~ ~</p> <p>40</p> <p>41</p>
<p style="text-align: right;">Page 3</p> <p>1 APPEARANCES, Continued:</p> <p>2</p> <p>3 On behalf of Mallinckrodt LLC and Spec</p> <p>4 Gx LLC:</p> <p>5 Ropes &amp; Gray LLP, by</p> <p>6 WILLIAM DAVISON, ESQ.</p> <p>7 Prudential Tower</p> <p>8 800 Boylston Street</p> <p>9 Boston, Massachusetts 02199-3600</p> <p>10 (617) 951-7000</p> <p>11 william.davison@ropesgray.com</p> <p>12 -and-</p> <p>13 Ropes &amp; Gray LLP, by</p> <p>14 HAYDEN MILLER, ESQ.</p> <p>15 1211 Avenue of the Americas</p> <p>16 New York, New York 10036-8704</p> <p>17 (212) 596-9451</p> <p>18 hayden.miller@ropesgray.com</p> <p>19</p> <p>20 On behalf of Cardinal Health:</p> <p>21 Porter Wright Morris &amp; Arthur, LLP,</p> <p>22 by</p> <p>23 SARA C. SCHIAVONE, ESQ.</p> <p>24 41 South High Street</p> <p>25 Suite 2800-3200</p> <p>26 Columbus, Ohio 43215-6194</p> <p>27 (614) 227-1994</p> <p>28 sschiavone@porterwright.com</p> <p>29</p> <p>30 On behalf of Walmart:</p> <p>31 Jones Day, by</p> <p>32 RICHARD M. BRODSKY, ESQ.</p> <p>33 150 West Jefferson, Suite 2100</p> <p>34 Detroit, Michigan 48226-4438</p> <p>35 (313) 230-7966</p> <p>36 rbrodsky@jonesday.com</p> <p>37 ~ ~ ~ ~ ~</p> <p>38</p> <p>39</p> <p>40</p> <p>41</p>	<p style="text-align: right;">Page 5</p> <p>1 TRANSCRIPT INDEX</p> <p>2</p> <p>3 APPEARANCES..... 2</p> <p>4</p> <p>5 INDEX OF EXHIBITS ..... 6</p> <p>6</p> <p>7 EXAMINATION OF MATTHEW PAOLINO</p> <p>8 By Mr. Block..... 12</p> <p>9 By Mr. Pulsipher..... 204</p> <p>10 By Mr. Davison..... 255</p> <p>11 By Mr. Brewer..... 261</p> <p>12 By Mr. Ledlie..... 278</p> <p>13 By Mr. Brewer..... 279</p> <p>14</p> <p>15 REPORTER'S CERTIFICATE..... 284</p> <p>16</p> <p>17 EXHIBIT CUSTODY</p> <p>18 EXHIBITS RETAINED BY THE COURT REPORTER</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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<p style="text-align: right;">Page 10</p> <p>1 THE VIDEOGRAPHER: The date is  2 December 5, 2018. We're on the record at  3 a.m.  4 This is the deposition of Matt  5 Paolino in the matter of In Re: National  6 Prescription Opiate Litigation in the United  7 States District Court, Northern District of  8 Ohio, Eastern Division.  9 Will counsel please state  10 appearances for the record.  11 MR. LEDLIE: This is James Ledlie  12 from the Motley Rice Law Firm on behalf of the  13 City of Akron and Summit County.  14 MS. RION: Caroline Rion on behalf  15 of City of Akron and Summit County.  16 MR. BLOCK: Good morning. Benjamin  17 Block and Bryant Pulsipher of Covington &amp;  18 Burling, LLP, on behalf of McKesson.  19 MR. DAVIS: William Davison of  20 Ropes &amp; Gray for Mallinckrodt, LLC, and SpecGx,  21 LLC.  22 MR. MILLER: Hayden Miller of Ropes  23 &amp; Gray on behalf of Mallinckrodt, LLC, and  24 SpecGx, LLC.  25 MR. BREWER: Matt Brewer from</p>	<p style="text-align: right;">Page 12</p> <p>1 Rules of Civil Procedure, being by me first  2 duly sworn, as hereinafter certified, deposed  3 and said as follows:  4 EXAMINATION OF MATTHEW PAOLINO  5 BY MR. BLOCK:  6 Q. Good morning.  7 A. Good morning.  8 Q. Let's start with, could you please  9 state your full name for the record?  10 A. My name is Matthew Paolino.  11 Q. All right. And, Mr. Paolino, where  12 do you live?  13 A. I'm moving this week. I live --  14 Q. Oh.  15 A. -- in the City of Akron, but I'm  16 moving to Green on Friday.  17 Q. To Greens?  18 A. Green. City --  19 Q. What --  20 A. -- of Green.  21 Q. Okay. How long have you lived in  22 Akron?  23 A. Since 2005, so.  24 Q. Where are you from originally?  25 A. New Franklin, Ohio.</p>
<p style="text-align: right;">Page 11</p> <p>1 Bartlit Beck on behalf of Walgreens.  2 MS. SCHIAVONE: Sara Schiavone,  3 Porter Wright, on behalf of Cardinal Health.  4 MR. BRODSKY: Richard Brodsky from  5 Jones Day on behalf of Walmart.  6 THE VIDEOGRAPHER: Will -- will  7 counsel on the phone please state appearances  8 for the record.  9 MS. HOSMER: This is Heather Hosmer  10 appearing on behalf of Endo and Par  11 Pharmaceutical Defendants.  12 MR. LAZAR: Zachary Lazar of Morgan  13 Lewis &amp; Bockius on behalf of the Teva  14 Defendants.  15 MR. BLOCK: Anybody else? Okay.  16 THE VIDEOGRAPHER: There's one  17 other --  18 MR. LEDLIE: Is there anyone else  19 on the line?  20 THE VIDEOGRAPHER: Okay. Sorry  21 about that.  22 Will the court reporter please  23 swear in the witness.  24 MATTHEW PAOLINO, of lawful age, called  25 for examination as provided by the Federal</p>	<p style="text-align: right;">Page 13</p> <p>1 Q. And I guess before I get going any  2 further, I should make sure you understand  3 you're testifying here under oath just as if  4 you were testifying in a court of law?  5 A. Sure. Yeah.  6 Q. All right. Any reason you can't  7 give full and truthful testimony today?  8 A. No.  9 Q. Terrific.  10 Have you -- have you done this  11 before, testified by deposition?  12 A. I've had one deposition.  13 Q. Okay. When was that?  14 A. Oh, it was probably somewhere  15 around '08.  16 Q. Okay. What was that about?  17 A. Inmate death.  18 Q. Were you a fact witness or an  19 expert witness in that case?  20 A. Just a fact witness.  21 Q. All right. Have you ever testified  22 at a trial?  23 A. Yeah. Small trials.  24 Q. How many?  25 A. Traffic. It was for traffic</p>

<p style="text-align: right;">Page 14</p> <p>1 tickets.</p> <p>2 Q. Do you know how many times?</p> <p>3 A. Well, I take -- there's been a few</p> <p>4 times. There was a -- a felony OVI, a couple</p> <p>5 traffic tickets. Just a few times that I can</p> <p>6 recall.</p> <p>7 Q. When was the most recent?</p> <p>8 A. That had to be six or seven years</p> <p>9 ago.</p> <p>10 Q. Okay. Did you do anything to</p> <p>11 prepare for your testimony today in this -- in</p> <p>12 this matter?</p> <p>13 A. Yeah.</p> <p>14 Q. What -- what did you do?</p> <p>15 A. I reviewed some of the paperwork</p> <p>16 I've produced over the years.</p> <p>17 Q. Anything else?</p> <p>18 A. I spoke with James on probably</p> <p>19 three occasions.</p> <p>20 Q. Okay. When was the most recent?</p> <p>21 A. A couple weeks ago. I think that's</p> <p>22 about right.</p> <p>23 Q. Okay. And you -- how many</p> <p>24 different times did you speak with Mr. Ledlie?</p> <p>25 A. Three.</p>	<p style="text-align: right;">Page 16</p> <p>1 sister about it.</p> <p>2 Q. Okay. What did you tell your</p> <p>3 sister?</p> <p>4 A. That I had to come do this.</p> <p>5 Q. Okay. Where does she -- she --</p> <p>6 where does she live?</p> <p>7 A. She lives in New Franklin.</p> <p>8 Q. Okay. What did she say when you</p> <p>9 told her you had to come to the depo?</p> <p>10 A. She was happy.</p> <p>11 Q. Why?</p> <p>12 A. She felt that it was important.</p> <p>13 Q. Did she say why?</p> <p>14 A. Yeah, she did.</p> <p>15 Q. Why?</p> <p>16 A. One of our family members started</p> <p>17 on prescription drugs and transitioned into</p> <p>18 heroin.</p> <p>19 Q. Into?</p> <p>20 A. Heroin.</p> <p>21 Q. And who was that?</p> <p>22 A. My niece.</p> <p>23 Q. Where does -- what's your niece's</p> <p>24 name?</p> <p>25 A. Nicole.</p>
<p style="text-align: right;">Page 15</p> <p>1 Q. Did you meet in person or just</p> <p>2 on -- talk --</p> <p>3 A. In person.</p> <p>4 Q. Three -- three times in person?</p> <p>5 A. Yeah.</p> <p>6 Q. All right. And how long -- how</p> <p>7 long were those meetings?</p> <p>8 A. They were probably a couple hours.</p> <p>9 Q. Anybody else present?</p> <p>10 A. Caroline.</p> <p>11 Q. Okay. Anybody else?</p> <p>12 A. Testing my memory here. There</p> <p>13 was -- I -- I don't believe so.</p> <p>14 Q. Have you spoken with anybody else</p> <p>15 about your deposition?</p> <p>16 A. No.</p> <p>17 Q. Have you spoken with anybody about</p> <p>18 the -- this lawsuit?</p> <p>19 A. When you say have I spoke with</p> <p>20 anybody else about the deposition, do you just</p> <p>21 mean a casual conversation or --</p> <p>22 Q. Sure. We could --</p> <p>23 A. Sure. Yeah, I have. Yeah.</p> <p>24 Q. Who? To who?</p> <p>25 A. Oh, my sister. I've talked to my</p>	<p style="text-align: right;">Page 17</p> <p>1 Q. Where does she live?</p> <p>2 A. She's dead.</p> <p>3 Q. Oh. Where did she live?</p> <p>4 A. Canal Fulton.</p> <p>5 Q. Canal --</p> <p>6 A. Canal Fulton, Ohio.</p> <p>7 Q. When did she -- when did she die?</p> <p>8 A. Sorry. This is a tough subject for</p> <p>9 me. August.</p> <p>10 Q. This -- this past Aug- --</p> <p>11 MR. LEDLIE: Do we need -- do we</p> <p>12 need to take a break?</p> <p>13 THE WITNESS: Are we going to keep</p> <p>14 going with this, or can you move on? Just --</p> <p>15 and come back to it. Just give me a minute.</p> <p>16 Q. Sure. Happy to do that.</p> <p>17 A. How about we do that?</p> <p>18 Q. Okay. And I'm sorry for your loss.</p> <p>19 Did you go to -- where -- where did</p> <p>20 you go to high school?</p> <p>21 A. Manchester High School.</p> <p>22 Q. Where -- where is that?</p> <p>23 A. It's in New Franklin.</p> <p>24 Q. New Franklin, okay.</p> <p>25 And did you go to college?</p>

<p style="text-align: right;">Page 18</p> <p>1 A. I did not.</p> <p>2 Q. All right. Do you have -- so do</p> <p>3 you have a -- did you graduate high school?</p> <p>4 A. Of course, yes.</p> <p>5 Q. Okay. Do you have any -- have you</p> <p>6 taken any college classes?</p> <p>7 A. No. My wife has taken enough for</p> <p>8 the both of us.</p> <p>9 Q. What does she do?</p> <p>10 A. She has her master's. She has her</p> <p>11 MBA. She works for Westfield Insurance.</p> <p>12 Q. Okay. When did you -- where was</p> <p>13 your first job out of high school?</p> <p>14 A. Had my first job in high school. I</p> <p>15 worked as a laborer for a mason- -- a mason.</p> <p>16 Q. When did you graduate high school?</p> <p>17 A. 1987.</p> <p>18 Q. All right. And so you work- -- you</p> <p>19 worked for a masoner in high school, and then</p> <p>20 after high school as well?</p> <p>21 A. Yeah, for a little time. And then</p> <p>22 I went to a place called Prime Metals in</p> <p>23 Aurora, and I was a -- I ran machinery.</p> <p>24 Q. Okay. How long were you at Prime</p> <p>25 Metals?</p>	<p style="text-align: right;">Page 20</p> <p>1 A. His name's Don Smith.</p> <p>2 Q. Is he -- is he a police officer?</p> <p>3 A. No. He -- he's a -- does</p> <p>4 insurance, as well, in Las Vegas.</p> <p>5 Q. Okay. So you went to the academy</p> <p>6 in 1993?</p> <p>7 A. Yeah. I graduated in '93.</p> <p>8 Q. Where was that?</p> <p>9 A. It was on Tallmadge Avenue. It was</p> <p>10 a private academy called SACS.</p> <p>11 Q. S-A -- how do you spell it?</p> <p>12 A. C-S.</p> <p>13 Q. S-A-C-S?</p> <p>14 A. Yeah.</p> <p>15 Q. Okay. And how long was that</p> <p>16 training?</p> <p>17 A. Back then I -- the training was</p> <p>18 about 480 hours, I believe. And then once you</p> <p>19 graduated that and start working for the</p> <p>20 sheriff's office, you had to go to a jail</p> <p>21 school, which was a couple weeks long.</p> <p>22 Q. When did you start at the -- well,</p> <p>23 did you go right from SACS to the sheriff's</p> <p>24 office?</p> <p>25 A. There was about an eight-month --</p>
<p style="text-align: right;">Page 19</p> <p>1 A. Probably from '88 till '93.</p> <p>2 Q. Okay. And what happened in '93?</p> <p>3 Where did you go?</p> <p>4 A. I went to the police academy.</p> <p>5 Q. Why did you decide to go to the --</p> <p>6 A. I got --</p> <p>7 Q. -- police academy?</p> <p>8 A. It was a lot of physical labor that</p> <p>9 I -- I didn't feel like doing anymore, and I</p> <p>10 wanted to pursue a career in law enforcement.</p> <p>11 Q. Did you know anyone else that had</p> <p>12 done that?</p> <p>13 A. I did.</p> <p>14 Q. Who -- who was that?</p> <p>15 A. I did. A friend of mine. He had</p> <p>16 went to -- he had went to a private academy,</p> <p>17 and I just happened to stop by his house one</p> <p>18 day and he -- he started showing me the ORC</p> <p>19 and -- and talked to me about the police</p> <p>20 academy, and -- and it sparked my interest.</p> <p>21 Q. ORC. I'm sorry.</p> <p>22 A. Ohio Revised Code book.</p> <p>23 Q. Got you. Thank you.</p> <p>24 A. Sure.</p> <p>25 Q. Who was that friend?</p>	<p style="text-align: right;">Page 21</p> <p>1 eight-month delay from graduating to getting</p> <p>2 hired. But I did get a -- they give you what's</p> <p>3 called a specials commission, where you can --</p> <p>4 you have all the authority of a law enforcement</p> <p>5 officer, but you're not working. It just keeps</p> <p>6 your commission active.</p> <p>7 Q. When did you start full-time -- did</p> <p>8 you at some point start full-time with the --</p> <p>9 A. Yeah.</p> <p>10 Q. -- sheriff's office?</p> <p>11 A. March of 1994.</p> <p>12 Q. Okay. And have you been employed</p> <p>13 by the sheriff's office from March of 1994</p> <p>14 through today?</p> <p>15 A. Yes. I had a break in service,</p> <p>16 probably in 1999, 2000.</p> <p>17 Q. What was -- why was that?</p> <p>18 A. I -- I quit.</p> <p>19 Q. Why?</p> <p>20 A. That -- that administration -- I've</p> <p>21 worked for four sheriffs. That administration</p> <p>22 and I didn't see eye to eye on a few things.</p> <p>23 Q. Can you -- what things?</p> <p>24 A. I was working patrol -- do you want</p> <p>25 the whole story?</p>



<p style="text-align: right;">Page 22</p> <p>1 Q. Please.</p> <p>2 A. Yeah. Okay.</p> <p>3 I was working -- I -- I -- was a</p> <p>4 deputy working patrol, and there was a -- one</p> <p>5 of our responsibilities was the airport, if</p> <p>6 you're assigned to the airport. They have</p> <p>7 regular people assigned to work the airport.</p> <p>8 I noticed the guy was -- who had</p> <p>9 worked the airport for years was going on</p> <p>10 vacation, and they scheduled me down there. I</p> <p>11 spoke to my supervisor and -- and said, "Hey,</p> <p>12 I've never worked at the airport. Can you send</p> <p>13 me down for some training?"</p> <p>14 Because I know you have to drive on</p> <p>15 the runways. I don't know if you've ever been</p> <p>16 on a runway, you know, but on a runway at</p> <p>17 night, the lights mean different things.</p> <p>18 They're, you know, different directions. This</p> <p>19 could be Hotel 19 this way, but Echo 21 this</p> <p>20 way. So I didn't understand how that worked.</p> <p>21 And I never got an opportunity to</p> <p>22 go down. I was just placed down there. And so</p> <p>23 I fumbled my way through a runway check one</p> <p>24 night, and I came back, and the tower called me</p> <p>25 and said, "Hey, you took too long. There's</p>	<p style="text-align: right;">Page 24</p> <p>1 editing.</p> <p>2 Q. Editing what?</p> <p>3 A. Video.</p> <p>4 Q. Oh, like home movies?</p> <p>5 A. No. I -- no. Like, I worked for</p> <p>6 Verizon doing little promotional videos.</p> <p>7 Q. Okay.</p> <p>8 A. I really enjoyed doing that kind of</p> <p>9 thing.</p> <p>10 Q. Okay. And I guess you came back?</p> <p>11 A. I did.</p> <p>12 Q. What brought you back?</p> <p>13 A. My wife got homesick, and we came</p> <p>14 back.</p> <p>15 Q. And when did you return to Ak- --</p> <p>16 to Akron?</p> <p>17 A. Yeah. I started back in September,</p> <p>18 at the sheriff's office, of 2001.</p> <p>19 Q. Was there a -- was there a new</p> <p>20 sheriff?</p> <p>21 A. Yes. And when I was in North</p> <p>22 Carolina, I called him and he said, "Yeah, I</p> <p>23 saw that. That was really messed up." And he</p> <p>24 sent me a check for my missed time. Just about</p> <p>25 90 percent of it.</p>
<p style="text-align: right;">Page 23</p> <p>1 planes coming in. You've got to get off the</p> <p>2 runway." I said, "Well, I'm not quite sure</p> <p>3 where I'm going."</p> <p>4 So one of the following nights, I</p> <p>5 pulled out to get on the runway, and, you know,</p> <p>6 you had a radio. You could call the tower.</p> <p>7 And my car number I think at the time was 568.</p> <p>8 And they said, "568, clear to proceed, hold</p> <p>9 short at Hotel 19 Echo."</p> <p>10 I just said, "Disregard. Disregard</p> <p>11 runway check." I turned around and I left.</p> <p>12 So I -- I was suspended for that</p> <p>13 for 30 days.</p> <p>14 Q. And that led you to --</p> <p>15 A. That angered me.</p> <p>16 Q. Okay.</p> <p>17 A. It may not have been the best</p> <p>18 response, but it angered me, so I left.</p> <p>19 Q. And what did you do for that</p> <p>20 period?</p> <p>21 A. I moved to North Carolina with my</p> <p>22 wife.</p> <p>23 Q. And what did you do in North</p> <p>24 Carolina?</p> <p>25 A. I started a small business of video</p>	<p style="text-align: right;">Page 25</p> <p>1 Q. Who was the -- who was the new</p> <p>2 sheriff?</p> <p>3 A. The new sheriff was Drew Alexander.</p> <p>4 Q. And who was the sheriff that you</p> <p>5 had disagreements with?</p> <p>6 A. Dick Warren.</p> <p>7 Q. Okay. Let's talk a little bit more</p> <p>8 about your time at the sheriff's office.</p> <p>9 When you started in 1994, what</p> <p>10 group, unit were you in?</p> <p>11 A. Everyone starts at the jail.</p> <p>12 Q. Okay.</p> <p>13 A. The sheriff's main responsibilities</p> <p>14 are the jail and the courthouse, so everyone</p> <p>15 starts there.</p> <p>16 The sheriff's office is contracted</p> <p>17 through different townships and cities to</p> <p>18 patrol and provide detective bureau services</p> <p>19 and things like that.</p> <p>20 Q. So what did you do at the jail?</p> <p>21 A. Watch prisoners. Guard the</p> <p>22 inmates. You know, fed them, assisted with</p> <p>23 medication pass, their com- -- commissary.</p> <p>24 Just basic duties.</p> <p>25 Q. How long were you assigned to the</p>

<p style="text-align: right;">Page 26</p> <p>1 jail?</p> <p>2 A. I think I left the jail -- from</p> <p>3 March of 1994 until I went to patrol in, I</p> <p>4 think, '99.</p> <p>5 Q. And what does it mean to be -- when</p> <p>6 you said you went to patrol, what did -- what</p> <p>7 do -- what do you do when you're in patrol?</p> <p>8 A. Low-post positions, different</p> <p>9 positions open in the -- in the sheriff's</p> <p>10 office. And depending on seniority, you put in</p> <p>11 for them. You bid on them. And if you have</p> <p>12 the seniority and -- and the, you know,</p> <p>13 qualifications, they'll reassign you to work</p> <p>14 patrol, where you answer calls for service.</p> <p>15 You know, crashes, accidents. You know, calls</p> <p>16 for service.</p> <p>17 Q. Okay. What -- what did you --</p> <p>18 what -- what was your assignment when you</p> <p>19 started in patrol? Did you have a particular</p> <p>20 location, route?</p> <p>21 A. They -- they moved you around a</p> <p>22 lot.</p> <p>23 Q. Okay.</p> <p>24 A. I was assigned, when I first went</p> <p>25 out, the city of Green.</p>	<p style="text-align: right;">Page 28</p> <p>1 A. I -- it was the '90s. You know, we</p> <p>2 would -- on traffic stops, sometimes you would</p> <p>3 get crack cocaine or -- or something like that.</p> <p>4 You know, I just -- one just jumps out in my</p> <p>5 mind was a guy had a substantial amount of</p> <p>6 crack cocaine hidden in the -- in his vehicle.</p> <p>7 But it was...</p> <p>8 Q. Was your involvement with narcotics</p> <p>9 incidental to responding to other scenes, or</p> <p>10 did you have any assignments --</p> <p>11 A. Yeah. It was -- it was more</p> <p>12 incidental.</p> <p>13 Q. Okay. Great.</p> <p>14 And I'll do my best to spit out a</p> <p>15 coherent question. I may not always succeed.</p> <p>16 But please let me -- for our court reporter,</p> <p>17 let me try to finish my question before --</p> <p>18 A. Oh, I'm sorry.</p> <p>19 Q. -- before your answer.</p> <p>20 A. I'm sorry.</p> <p>21 Q. You're doing great. You're doing</p> <p>22 great.</p> <p>23 Any -- do you recall anything</p> <p>24 involving prescription medications when you --</p> <p>25 during this stint on patrol?</p>
<p style="text-align: right;">Page 27</p> <p>1 Q. Okay. That's where you're moving</p> <p>2 to now?</p> <p>3 A. Yeah.</p> <p>4 Q. All right. And what -- what were</p> <p>5 you -- what were you supposed to do in the city</p> <p>6 of Green? What were you looking for?</p> <p>7 A. I mean, we spent a lot of time -- I</p> <p>8 worked the midnight shift, so we spent a lot of</p> <p>9 time on neighborhood patrols: checking</p> <p>10 businesses, answering a lot of accidents, a lot</p> <p>11 of calls for service for accidents, things of</p> <p>12 that nature.</p> <p>13 Q. All right. And how long were you</p> <p>14 in the patrol unit? That was until --</p> <p>15 A. Yeah.</p> <p>16 Q. How long were you in the patrol</p> <p>17 before you did your -- had your break in</p> <p>18 service, if you remember?</p> <p>19 A. I think it was two years.</p> <p>20 Q. Okay. And during that first</p> <p>21 installment with the patrol unit, did you have</p> <p>22 any involvement with anything involving</p> <p>23 narcotics?</p> <p>24 A. Yeah.</p> <p>25 Q. How so?</p>	<p style="text-align: right;">Page 29</p> <p>1 A. Specifically? I don't recall.</p> <p>2 Q. When you returned to the -- do I</p> <p>3 say the sheriff's department? The sheriff's</p> <p>4 office?</p> <p>5 A. It's a sheriff's office, because</p> <p>6 the -- it's called the sheriff's office because</p> <p>7 he's an elected official.</p> <p>8 Q. When you returned -- thank you.</p> <p>9 When you returned to the sheriff's office in</p> <p>10 2001, what -- where were you assigned?</p> <p>11 A. Jail. Summit County Jail.</p> <p>12 Q. How long were you at the jail?</p> <p>13 A. I came back -- I was probably back</p> <p>14 another four or five years.</p> <p>15 Q. The -- you mentioned earlier you</p> <p>16 testified in an inmate death case. Do you</p> <p>17 remember what -- was that related to one of</p> <p>18 these periods of time when you were assigned to</p> <p>19 the jail?</p> <p>20 A. It was the second time.</p> <p>21 Q. Okay.</p> <p>22 A. Yes.</p> <p>23 Q. All right. Have you ever -- have</p> <p>24 you personally ever been sued?</p> <p>25 A. Yeah.</p>



<p style="text-align: right;">Page 30</p> <p>1 Q. How -- how many times?</p> <p>2 A. I'm being sued right now.</p> <p>3 Q. For what?</p> <p>4 A. I had a very low-speed bump into</p> <p>5 somebody on Route 8. They went to a</p> <p>6 chiropractor 30, 40 times. So suing the</p> <p>7 County.</p> <p>8 Q. Okay. Any -- any other times?</p> <p>9 A. No.</p> <p>10 Q. So when -- after the four or five</p> <p>11 years in the jail -- well, let me ask you this.</p> <p>12 During your time in the -- do I say the jail</p> <p>13 unit? Is that --</p> <p>14 A. Jail.</p> <p>15 Q. Okay.</p> <p>16 A. Summit County Jail.</p> <p>17 Q. During your time at the jail, did</p> <p>18 you have any involvement with any issues</p> <p>19 related to narcotics?</p> <p>20 MR. LEDLIE: Object to the form of</p> <p>21 the question.</p> <p>22 You can answer if you understand.</p> <p>23 A. Can you explain what you're asking</p> <p>24 me? I -- I'm not sure.</p> <p>25 Q. Any of your job duties or anything</p>	<p style="text-align: right;">Page 32</p> <p>1 nurse would come around with her medical cart</p> <p>2 and pass out the medications to the inmates.</p> <p>3 Q. Do you know whether prescription</p> <p>4 opioid medication was available to the inmates?</p> <p>5 A. I -- I'm not -- I'm not 100 percent</p> <p>6 sure. I know they got methadone and things</p> <p>7 like that, but I don't know if they passed out</p> <p>8 hydrocodone or oxycodone or anything like that.</p> <p>9 I wasn't --</p> <p>10 Q. What -- oh, I'm sorry. Go ahead.</p> <p>11 A. I wasn't privy to their medical</p> <p>12 records.</p> <p>13 Q. Okay. When -- what was your next</p> <p>14 duty assignment after the jail unit?</p> <p>15 A. I went back to patrol.</p> <p>16 Q. When was that?</p> <p>17 A. It must have been -- it must have</p> <p>18 been around '05.</p> <p>19 Q. And how long were you in the patrol</p> <p>20 unit?</p> <p>21 A. Probably another year.</p> <p>22 Q. And what came next?</p> <p>23 A. I was promoted to sergeant.</p> <p>24 Q. And when you got promoted, what --</p> <p>25 what was your assignment?</p>
<p style="text-align: right;">Page 31</p> <p>1 that you did on the job at the jail relate at</p> <p>2 all to narcotics? Did you, I don't know,</p> <p>3 investigate for narcotics or --</p> <p>4 A. There would be times that people</p> <p>5 would come in with narcotics on their person.</p> <p>6 You know, that -- back then, they would have to</p> <p>7 be -- the narcotics would have to be returned</p> <p>8 to the transporting officer, and they would</p> <p>9 have to fill out the report and charges,</p> <p>10 because they didn't want to accept them into</p> <p>11 the jail.</p> <p>12 Q. Any- -- anything else? Any other</p> <p>13 involvement with narcotics-related issues when</p> <p>14 you were at the jail?</p> <p>15 A. The inmates. I mean, the people</p> <p>16 coming in, many of them were -- had issues with</p> <p>17 drugs and alcohol and...</p> <p>18 Q. Do you -- do -- I think you said</p> <p>19 that part of your -- sometimes you would go</p> <p>20 with an inmate when they were getting medicine</p> <p>21 or medical issues?</p> <p>22 A. Several jobs in the jail, you -- if</p> <p>23 an inmate was sick, you would take them down to</p> <p>24 the dispensary. And then every morn- -- or</p> <p>25 three times a day I think it was back then, a</p>	<p style="text-align: right;">Page 33</p> <p>1 A. Back to the jail.</p> <p>2 Q. Did you like working at the jail?</p> <p>3 A. It wasn't bad.</p> <p>4 Q. How long were you at the jail as a</p> <p>5 sergeant?</p> <p>6 A. I'm trying to remember. I went</p> <p>7 back to the jail in -- I got promoted in '06.</p> <p>8 I stayed out for a while, went back to the</p> <p>9 jail. I went to civil division probably in</p> <p>10 2010.</p> <p>11 Q. What's the civil division?</p> <p>12 A. It's the division of the</p> <p>13 courthouse. Deputies would -- one of my jobs</p> <p>14 was to serve paperwork.</p> <p>15 Q. Like warrants and things? Or --</p> <p>16 A. Yeah, an occasional warrant. It</p> <p>17 would be more -- more or less home</p> <p>18 foreclosures, papers like that. Civil</p> <p>19 paperwork.</p> <p>20 Q. And how long were you in the civil</p> <p>21 division?</p> <p>22 A. I was promoted to lieutenant in</p> <p>23 '11, 2011, so I was there maybe another year</p> <p>24 and a half. Maybe a year and a half. A year,</p> <p>25 a year and a half.</p>

<p style="text-align: right;">Page 34</p> <p>1 Q. You were in the civil division 2 until you were promoted to lieutenant? 3 A. Yeah. 4 Q. Okay. 5 A. And I stayed a very short time, 6 until they figured out where they were moving 7 people. 8 Q. And where did -- where did they 9 move you to? 10 A. I bet you can guess. The jail. 11 Q. Oh, okay. I should have. All 12 right. 13 And what -- and when you're a 14 lieutenant at the jail, what are you -- what 15 are you doing that's different from when you're 16 a sergeant or -- what was your rank before -- 17 did you have a rank before sergeant? What did 18 they -- 19 A. You're just a deputy. 20 Q. Deputy, okay. 21 A. In the jail is more -- when -- as 22 you progress through the ranks, it's more -- 23 becomes more administrative: scheduling, jail 24 counts. You want to make sure you have 25 everybody that's supposed to be there. It's</p>	<p style="text-align: right;">Page 36</p> <p>1 A. Just trying something new, learning 2 a new part of the sheriff's office. 3 Q. Prior to late 2012, had you had -- 4 what involvement, if any, had -- had you 5 personally had with narcotics, narcotics-related 6 activity? 7 MR. LEDLIE: Object to the form of 8 the question. 9 You can answer. 10 THE WITNESS: Okay. 11 A. You know, you're really not exposed 12 to that area working -- you're not exposed to 13 the -- the in-depth investigations, the 14 narcotics investigations. It's a very -- it's 15 a -- the office is housed off site. It's kind 16 of -- it's in a -- supposed to be a secret 17 location. You know, it's not -- 18 Q. What's the address? No, I'm 19 kidding. 20 A. It's not talked about very much, so 21 it was intriguing, you know. 22 Q. And did you have to apply -- 23 A. I did. 24 Q. -- for the position? 25 Do you know if others applied for</p>
<p style="text-align: right;">Page 35</p> <p>1 just administrative duties. 2 Q. What was your next assignment after 3 the -- after the jail as a lieutenant? 4 A. From the jail, I went to the Summit 5 County Drug Unit. 6 Q. When -- when was that? 7 A. That was late 2012. It's October 8 2012. 9 Q. And how did -- what was the reason 10 you went to the Summit County Drug Unit? 11 A. The prior commander was retiring. 12 I think he retired. And the position became 13 available, and I -- it interested me, the job. 14 Q. Who was the prior commander? 15 A. Hylton Baker. 16 Q. And you said he retired? 17 A. Uh-huh. 18 Q. He? Hylton, yeah. 19 A. Yeah, Hylton's a man. 20 Q. Okay. Is he -- does he still live 21 in the area; do you know? 22 A. Yes. I don't know exactly where he 23 lives, but he's still in the area. 24 Q. All right. What about the job 25 interested you?</p>	<p style="text-align: right;">Page 37</p> <p>1 the position? 2 A. They did. 3 Q. Did you have to interview with 4 anyone? 5 A. No. I -- I talked to the sheriff 6 on the phone. I called him. 7 Q. Who was the sheriff at the time? 8 A. It was Drew Alexander. The one 9 that hired me back. 10 Q. And do you know who else applied? 11 A. I believe -- I believe maybe one or 12 two other guys. I know one for sure. 13 Q. Who was that? 14 A. His name is Scott Cottle. 15 Q. What's -- 16 A. Scott Cottle, C-o-t-t-l-e. 17 Q. Okay. And what -- when you were 18 assigned to the Summit County Drug Unit, what 19 was your -- did your position have a -- what 20 was the title of your position? 21 A. Task force commander. 22 Q. Task force commander. 23 To whom did you report at that 24 time? 25 A. At that time it was Inspector Bill</p>

<p style="text-align: right;">Page 38</p> <p>1 Holland.</p> <p>2 Q. What was -- and what was your rank</p> <p>3 at the time you became the --</p> <p>4 A. Lieutenant.</p> <p>5 Q. Okay. And so you reported to</p> <p>6 Inspector Holland. Who was reporting to you?</p> <p>7 A. There was probably -- you know,</p> <p>8 it's any given day, there could be 24 to 26</p> <p>9 guys that report to me from different police</p> <p>10 agencies in Summit County.</p> <p>11 Q. All right. Let's -- let's learn a</p> <p>12 little bit more about the Summit --</p> <p>13 A. Okay.</p> <p>14 Q. -- County Drug Unit.</p> <p>15 I guess first question is what --</p> <p>16 what's the -- what's the mission of that unit?</p> <p>17 A. The mission of Summit County Drug</p> <p>18 Unit is disrupt and dismantle major drug</p> <p>19 trafficking organizations. And it's trying to</p> <p>20 stem the flow of illicit narcotics into the</p> <p>21 county.</p> <p>22 Q. And was that the mission when you</p> <p>23 joined that unit in 2012?</p> <p>24 A. Yeah.</p> <p>25 Q. And is that still the mission</p>	<p style="text-align: right;">Page 40</p> <p>1 for information sharing.</p> <p>2 The local agencies will supply a</p> <p>3 detective, like, in support of the mission</p> <p>4 statement. So there are 14 agencies and 20- --</p> <p>5 the -- the staffing changes day to day to.</p> <p>6 It's who -- it's some DEA guys, Drug</p> <p>7 Enforcement Administration guys, will -- they</p> <p>8 don't spend 40 hours there. They may work in</p> <p>9 Medina and come over to the drug unit a few</p> <p>10 days a week, so it's not a set number, you</p> <p>11 know.</p> <p>12 So what else do you want to know?</p> <p>13 Where are we at with this? What's the --</p> <p>14 Q. Trying to figure out who -- who</p> <p>15 works there.</p> <p>16 A. Okay. So we have -- I can try and</p> <p>17 list them off here. We have New Franklin PD,</p> <p>18 Barberton Police.</p> <p>19 Q. And when you say -- so just so I'm</p> <p>20 clear, when you say you have New Franklin PD,</p> <p>21 that means that police department --</p> <p>22 A. They have assigned a detective to</p> <p>23 the unit. Sorry.</p> <p>24 Q. Okay.</p> <p>25 A. Copley Police has assigned a</p>
<p style="text-align: right;">Page 39</p> <p>1 today?</p> <p>2 A. I believe so, yeah.</p> <p>3 Q. All right. And what -- who</p> <p>4 works -- describe for me the personnel involved</p> <p>5 with the Summit County Drug Unit.</p> <p>6 Let- -- and we can start -- let's</p> <p>7 start when you -- when you joined in 2012, and</p> <p>8 then we can talk about whether it's --</p> <p>9 A. Okay.</p> <p>10 Q. -- any different today.</p> <p>11 A. You know, staff has changed over</p> <p>12 the years.</p> <p>13 Q. Sure. Let's -- first, just, like,</p> <p>14 types of positions, and then --</p> <p>15 A. Okay.</p> <p>16 Q. -- we can go into --</p> <p>17 A. Sure.</p> <p>18 Q. -- individual people.</p> <p>19 A. In our office building, it's --</p> <p>20 it's co-located with Akron narcotics. So</p> <p>21 basically -- just so you have an understanding,</p> <p>22 half the side is the Summit County Drug Unit,</p> <p>23 of a bullpen. The other half is Akron</p> <p>24 narcotics. And there's federal special agents</p> <p>25 intermingled in there, in the mix, okay? It's</p>	<p style="text-align: right;">Page 41</p> <p>1 detective. Springfield Police Department</p> <p>2 assigned a detective. Akron Police has</p> <p>3 assigned a detective. Reminderville Police</p> <p>4 Department has a detective assigned. Silver</p> <p>5 Lake Police Department has a detective</p> <p>6 assigned. The DEA has assigned -- Drug</p> <p>7 Enforcement Administration has assigned four</p> <p>8 agents. In 2012 the FBI had a special agent</p> <p>9 attached to the unit. So it's -- I don't think</p> <p>10 I missed anybody. Stow Police has a detective</p> <p>11 assigned to the unit.</p> <p>12 So it's all a collaborative effort.</p> <p>13 If there's a complaint in Stow -- you know, my</p> <p>14 selling point to get agencies to join was if</p> <p>15 there's a drug complaint in Stow and you don't</p> <p>16 have the manpower, you can take all of us. You</p> <p>17 know, we'll all go to your area and assist with</p> <p>18 a complaint. So you're getting kind of a whole</p> <p>19 task force for the price of one guy.</p> <p>20 Q. And when you say "the price of one</p> <p>21 guy," does that mean that the New Franklin</p> <p>22 Police Department was paying the salary of --</p> <p>23 A. Yeah.</p> <p>24 Q. -- the --</p> <p>25 A. Yes. New --</p>

<p style="text-align: right;">Page 42</p> <p>1 Q. -- New Franklin -- let me spit --  2 spit the question out, sorry, just for the  3 record.  4 So the New Franklin Police  5 Department was paying the salary of the New  6 Franklin Police Department detective who was  7 assigned to the drug unit?  8 A. Yeah. They pay their salary and  9 benefits.  10 Q. What -- your salary and benefits as  11 the -- commander of the drug unit; is that  12 right?  13 A. Uh-huh. Yeah.  14 Q. Is that the right title?  15 A. Sure.  16 Q. Okay. Who -- who paid your salary  17 and benefits?  18 A. My salary comes from the grant.  19 Two grants.  20 Q. Grant from who or from what?  21 A. One is a federal grant. One is a  22 state grant.  23 Q. Okay. And has that always been the  24 case?  25 A. Yeah. I'm pretty sure it's been</p>	<p style="text-align: right;">Page 44</p> <p>1 Q. Okay. When did that change? Was  2 there anybody between Holland and Rhoades that  3 you reported to?  4 A. No.  5 Q. Okay. So when did that change from  6 Holland --  7 A. It was -- it was Bill -- Inspector  8 Bill Holland until Sheriff Steve Barry became  9 sheriff, and that was in, I think, '13.  10 Q. 2013?  11 A. I think it was '13.  12 Q. Uh-huh. Okay.  13 A. And then he assigned Inspector  14 Chris Rhoades to oversee the drug unit.  15 Q. Okay. And when you say "to oversee  16 the drug unit," what does that mean?  17 A. It means I report to him. You  18 know, you have to answer to somebody. I -- I  19 answer to Chris Rhoades.  20 Q. Okay. Well, what -- what do you  21 have to answer to him about? What are you  22 reporting to him?  23 MR. LEDLIE: Object to the form of  24 the question.  25 You can answer.</p>
<p style="text-align: right;">Page 43</p> <p>1 that way the entire time.  2 Q. All right. What is -- you --  3 you -- you reported to Inspector Holland at the  4 time? What --  5 A. At the time, yeah.  6 Q. Who was Inspector Holland? Who did  7 he work for?  8 A. Well, he would have reported to a  9 major, and a major would have reported to the  10 sheriff.  11 Q. Okay. So Inspector Holland's  12 someone in -- in the Summit County Sheriff's  13 office?  14 A. He is.  15 Q. All right. Is he still there?  16 A. He is.  17 Q. What's he do now?  18 A. Currently he's in charge of the  19 Summit County Jail. He's also our public  20 information officer.  21 Q. Okay. When did he -- so who do you  22 report to today?  23 A. Who does -- who do I report to?  24 Q. Yes.  25 A. Inspector Chris Rhoades.</p>	<p style="text-align: right;">Page 45</p> <p>1 THE WITNESS: Okay.  2 A. He just wants updates on our  3 investigations, drug seizures. The -- the  4 sheriff's office has staff meetings twice a  5 week, and he likes to be able to report to the  6 sheriff that we're actually working and what  7 we're doing.  8 Q. Do you go to those staff meetings?  9 A. No.  10 Q. How do you -- how do you report to  11 Inspector -- and is what you report to  12 Inspector Rhoades the same kind of stuff you  13 were reporting to Inspector Holland?  14 A. Yeah, Bill was a little different.  15 Q. How so?  16 A. His feelings were, "Call me if it's  17 going to be in the newspaper." He just said  18 just -- you know, he said, "Just get your work  19 done."  20 Q. He --  21 A. "Do your job."  22 Q. If I'm discerning that correctly,  23 he -- he needed fewer updates than does --  24 A. Yeah.  25 Q. -- Inspector Rhoades?</p>

<p style="text-align: right;">Page 46</p> <p>1 A. That's a good way to put it.</p> <p>2 Q. Okay.</p> <p>3 A. Needed fewer updates.</p> <p>4 Q. How -- what kind of things would</p> <p>5 you call Inspector Holland about that met the</p> <p>6 "in the newspaper" criteria?</p> <p>7 A. Well, if -- if we were doing a --</p> <p>8 if we did a SWAT entry or something like that,</p> <p>9 neighbors would start calling and then it would</p> <p>10 end up in the newspaper somehow or another, and</p> <p>11 he would like to give the sheriff a heads-up if</p> <p>12 something like that was coming.</p> <p>13 Q. What's the -- what's the</p> <p>14 geographical scope? I -- I feel like this</p> <p>15 should be obvious, but I'm not positive.</p> <p>16 A. Okay.</p> <p>17 Q. What's the geographical scope of</p> <p>18 each Summit County Drug Unit's operations?</p> <p>19 A. Summit County.</p> <p>20 Q. All right. Are there any -- does</p> <p>21 the drug unit do anything outside of Summit</p> <p>22 County?</p> <p>23 A. Sure. Yeah, on occasion.</p> <p>24 Q. How -- describe that, how that</p> <p>25 happens.</p>	<p style="text-align: right;">Page 48</p> <p>1 A. Yeah. That's fair.</p> <p>2 Q. Okay. What -- the detectives that</p> <p>3 are assigned to the task force, can you</p> <p>4 describe for us, please, what -- what do they</p> <p>5 do all day? What -- what are -- what are they</p> <p>6 working on?</p> <p>7 A. Drug complaints. You know, it --</p> <p>8 we get drug complaints from the Internet, from</p> <p>9 Facebook, phone-in complaints, and those are</p> <p>10 handed out, passed out by jurisdiction. If we</p> <p>11 get a complaint in New Franklin, it will go to</p> <p>12 a the New Franklin officer, would take the</p> <p>13 lead. If we get a complaint in Copley, it will</p> <p>14 go to the Copley officer to take the lead.</p> <p>15 This -- they -- they work on drug complaints</p> <p>16 daily.</p> <p>17 Q. And how does a detective work on a</p> <p>18 drug complaint? What does that entail?</p> <p>19 A. They sign -- we have a source of</p> <p>20 information. You sign that source of</p> <p>21 information up as a confidential informant.</p> <p>22 They interview him. They interview the</p> <p>23 individual, complete a confidential informant</p> <p>24 package, write up a report of investigation,</p> <p>25 and it goes to the sergeant for approval, and</p>
<p style="text-align: right;">Page 47</p> <p>1 A. We have federal agents on the task</p> <p>2 force, and there have been times where we've</p> <p>3 went out of town following somebody and ended</p> <p>4 up in Columbus or something like that.</p> <p>5 Q. Is it only the federal agents that</p> <p>6 are authorized to do that within the task</p> <p>7 force?</p> <p>8 A. We can follow a felony, but -- so,</p> <p>9 no. The answer to that question is no, but.</p> <p>10 Q. But as a general matter, if it --</p> <p>11 A. Yeah.</p> <p>12 Q. -- if it's outside the -- the</p> <p>13 county, it's going to be --</p> <p>14 A. Yeah. They're --</p> <p>15 Q. -- one of the -- let me just finish</p> <p>16 the question.</p> <p>17 A. Sorry.</p> <p>18 Q. -- it's going to be one of the</p> <p>19 federal people assigned to the task force</p> <p>20 that's going to have the lead in following up?</p> <p>21 A. Yes.</p> <p>22 MR. LEDLIE: Object to the form of</p> <p>23 the question.</p> <p>24 You can answer.</p> <p>25 Q. Is that right?</p>	<p style="text-align: right;">Page 49</p> <p>1 then it comes to me for final approval.</p> <p>2 Q. Approval of what?</p> <p>3 A. That he's suitable to use as a</p> <p>4 confidential informant.</p> <p>5 Q. Okay. Who's the sergeant?</p> <p>6 A. It's Jer- -- Jerry Angerstein.</p> <p>7 Q. How long has Sergeant Angerstein --</p> <p>8 is there only one sergeant --</p> <p>9 A. Yes.</p> <p>10 Q. -- in the drug unit?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. How long has -- I'm sorry.</p> <p>13 A. Yes. One that carries a</p> <p>14 supervisory role.</p> <p>15 Q. Okay. How long has Sergeant</p> <p>16 Angerstein had the supervisory role?</p> <p>17 A. Let's see. This is December. He's</p> <p>18 been there a very short time. The last</p> <p>19 sergeant, Sergeant Pat Hunt, retired in August,</p> <p>20 end of August, and Jerry replaced him, so he's</p> <p>21 been there a very short time.</p> <p>22 Q. Where was he before that?</p> <p>23 A. Jerry was the supervisor on patrol.</p> <p>24 One of them.</p> <p>25 Q. Is he a Summit County Sheriff's</p>



<p style="text-align: right;">Page 50</p> <p>1 Office --</p> <p>2 A. Yes, he is.</p> <p>3 Q. -- sergeant? Okay.</p> <p>4 And you said that before that it</p> <p>5 was Sergeant Pat Hunt?</p> <p>6 A. Uh-huh.</p> <p>7 Q. How long was Sergeant Hunt the</p> <p>8 supervisory sergeant at the drug unit?</p> <p>9 A. I think a little over five years.</p> <p>10 He came in -- I came in at the end of '12. He</p> <p>11 came in in the summer of '13.</p> <p>12 Q. Who was the supervisory sergeant</p> <p>13 when you started with the drug unit?</p> <p>14 A. There was a -- it was Don Joseph,</p> <p>15 Donald Joseph.</p> <p>16 Q. And where is Sergeant Joseph today?</p> <p>17 A. He's now a lieutenant.</p> <p>18 Q. Where is Lieutenant Joseph today?</p> <p>19 A. He's at the jail.</p> <p>20 Q. Okay. And were there any other</p> <p>21 supervisory sergeants between Joseph and Hunt?</p> <p>22 A. No.</p> <p>23 Q. And what are the responsibilities</p> <p>24 of the supervisory sergeant?</p> <p>25 A. The supervisory sergeant is in</p>	<p style="text-align: right;">Page 52</p> <p>1 A. For the sergeant?</p> <p>2 Q. Yes.</p> <p>3 A. Our duties have changed, yeah.</p> <p>4 Q. How so?</p> <p>5 A. Well, I mean, the types of</p> <p>6 incidents that we responded to have changed, so</p> <p>7 the duties have changed.</p> <p>8 Q. How -- how have things changed?</p> <p>9 MR. LEDLIE: Object to the form.</p> <p>10 Vague.</p> <p>11 Q. In your last answer, you said, "The</p> <p>12 types of incidents that we have responded to</p> <p>13 have changed." What did you mean by that?</p> <p>14 A. When I first started in the drug</p> <p>15 unit, the -- we were probably responding to --</p> <p>16 I don't remember the exact number, but it was</p> <p>17 over a hundred one-pot meth labs, so the</p> <p>18 responsibility at that time was meth lab</p> <p>19 cleanup.</p> <p>20 So that's how they've changed. You</p> <p>21 know, that -- you know, you could see that</p> <p>22 trend dying and other trends beginning to take</p> <p>23 off.</p> <p>24 Q. Does that mean that meth was the</p> <p>25 focus of the drug unit's activities in 2012?</p>
<p style="text-align: right;">Page 51</p> <p>1 charge of operations in the field.</p> <p>2 Q. What's that mean?</p> <p>3 A. When -- when they go out to make</p> <p>4 drug buys, he's the supervisor in charge.</p> <p>5 If -- he makes decisions like when to call off</p> <p>6 something if it becomes dangerous, he feels</p> <p>7 it's dangerous, or when something he doesn't</p> <p>8 like or -- he can call off the entire</p> <p>9 operation.</p> <p>10 And he's responsible for other</p> <p>11 little things like if -- if a door is broken,</p> <p>12 you know, from a SWAT entry or something like</p> <p>13 that, he calls the board-up company --</p> <p>14 Q. Calls the what? Sorry.</p> <p>15 A. Like -- like a board-up company --</p> <p>16 Q. Oh, okay.</p> <p>17 A. -- to, you know, repair the</p> <p>18 house --</p> <p>19 Q. Yeah.</p> <p>20 A. -- cover a window. You know, he --</p> <p>21 he has a lot of duties like that.</p> <p>22 Q. Okay. Have those duties and</p> <p>23 responsibilities changed over time? Over your</p> <p>24 time involved? Your time of involvement with</p> <p>25 the Summit County Drug Unit?</p>	<p style="text-align: right;">Page 53</p> <p>1 I'm not sure I understand.</p> <p>2 MR. LEDLIE: Object to the form.</p> <p>3 A. It was one of them.</p> <p>4 Q. Okay. If the meth trend was dying,</p> <p>5 what other trend -- what trends were beginning</p> <p>6 to take off?</p> <p>7 MR. LEDLIE: Object to the form of</p> <p>8 the question.</p> <p>9 THE WITNESS: Can I answer that?</p> <p>10 MR. LEDLIE: Yeah.</p> <p>11 THE WITNESS: Yeah.</p> <p>12 MR. LEDLIE: If you understand it.</p> <p>13 THE WITNESS: I think so.</p> <p>14 A. Well, the -- the production of meth</p> <p>15 had changed from the home cook to now we</p> <p>16 started to see an influx of crystallized meth.</p> <p>17 So it -- it became cheaper, more readily</p> <p>18 available. So that's one of the trends we</p> <p>19 noticed.</p> <p>20 Q. Any other trends that you've</p> <p>21 noticed?</p> <p>22 A. Heroin began to pick up, become</p> <p>23 more popular, become -- I believe we had</p> <p>24 more -- more deaths right around that time.</p> <p>25 Heroin had started to increase, the heroin. We</p>



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1 started seeing more heroin.  
 2 Q. When you said "right around that  
 3 time," what time do you mean?  
 4 A. Probably around '13 or '14. When  
 5 I -- and I can expand on that just a little  
 6 bit.  
 7 Q. Please.  
 8 A. When I talked to my boss, who used  
 9 to be a sergeant in the drug unit, they  
 10 never -- they didn't see a lot of heroin, so it  
 11 was a big deal if they saw even a little bit of  
 12 heroin. So we started seiz- -- seizing large  
 13 amounts, large quantities, of heroin around  
 14 that time.  
 15 Q. Which boss were you referring to?  
 16 A. I'm sorry. Chris Rhoades.  
 17 Q. Okay.  
 18 A. He's been around -- he's probably  
 19 been in the sheriff's office close to 40 years.  
 20 Q. And he was in the drug unit at some  
 21 point before he was --  
 22 A. He was, yeah.  
 23 Q. Do you know what his -- what --  
 24 what was his job immediately before becoming  
 25 the inspector to whom you report?

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1 A. Immediately before?  
 2 Q. Yeah.  
 3 A. Chris Rhoades was -- he was the  
 4 person in charge of extra details for --  
 5 remember I told you about special deputies.  
 6 They're given a commission by the sheriff.  
 7 They can -- one of the things they can do to  
 8 make money is do a traffic detail or -- or  
 9 direct traffic or work at a school or something  
 10 like that. This is full-time guys, too. His  
 11 job was scheduling those types of things.  
 12 Q. Let's go back a little bit --  
 13 A. Okay.  
 14 Q. Oh, I'm sorry.  
 15 A. No, go ahead.  
 16 Q. Oh. When you -- when you became  
 17 the commander of the drug unit, did you get any  
 18 training from anyone as part of assuming that  
 19 new responsibility?  
 20 A. Hylton Baker, he was there maybe a  
 21 couple months. I got to meet with him a few  
 22 times.  
 23 I did go to the DEA basic narcotic  
 24 investigator course. There was some training  
 25 in there on the supervisory role of a task

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1 force commander.  
 2 I've taken some online courses  
 3 through Bureau of Justice Assistance, task  
 4 force commander courses.  
 5 Q. Anything else?  
 6 A. No. Not that I can think of off  
 7 the top of my head.  
 8 Q. The -- the DEA basic narcotic  
 9 investigator course --  
 10 A. Uh-huh.  
 11 Q. -- where was that?  
 12 A. That was held at Ohio HIDTA  
 13 building in Cleveland.  
 14 Q. How long was that course?  
 15 A. Two weeks.  
 16 Q. When did you attend that course?  
 17 A. I don't remember exactly. I don't  
 18 remember exactly. Sorry.  
 19 Q. Was there anything in that course  
 20 about prescription opioid medication?  
 21 A. There was a doctor that gave a  
 22 course. I -- I believe he was a pharmacist. I  
 23 don't remember his name. I wish I did. He was  
 24 a great -- great instructor. He taught us  
 25 about prescriptions, the DEA numbers, how to

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1 tell if they're real on a prescription pad.  
 2 Yeah, there was -- so, yes, there was.  
 3 Q. Remember how long that part of the  
 4 training was?  
 5 A. Exactly? No, I don't remember how  
 6 long it was.  
 7 Q. Do you remember what department,  
 8 agency, or where that person was from?  
 9 A. No.  
 10 Q. Do you have any advanced medical  
 11 training?  
 12 A. No.  
 13 Q. Any advanced training in  
 14 pharmacology?  
 15 A. No.  
 16 Q. Any training in the mechanisms of  
 17 action of prescription medications?  
 18 A. Mechanism of action?  
 19 Q. How they work.  
 20 A. I mean, I've -- I've been to  
 21 conferences around the state, and I -- not  
 22 official training, but they're trainings that  
 23 you don't get certificates for. They've  
 24 explained how the opioids bind to neuron  
 25 receptors in the brain. So basic

<p style="text-align: right;">Page 58</p> <p>1 understanding, sure.</p> <p>2 Q. Do you have any advanced training</p> <p>3 in the causes of addiction?</p> <p>4 MR. LEDLIE: Object to the form of</p> <p>5 the question.</p> <p>6 A. When you say "advanced training,"</p> <p>7 can you clarify? I mean, I've been to a lot</p> <p>8 of --</p> <p>9 Q. Have you -- have you -- let's start</p> <p>10 with this. Have you taken any -- any course</p> <p>11 for credit that specifically --</p> <p>12 A. Okay. No.</p> <p>13 Q. -- relates to --</p> <p>14 A. Then the answer is no.</p> <p>15 Q. -- causes of addiction?</p> <p>16 Okay. Same question about</p> <p>17 treatment of addiction.</p> <p>18 A. Then the answer would be no.</p> <p>19 Q. So to the extent you've learned</p> <p>20 anything about the causes of addiction or</p> <p>21 treatment of addiction, it's just stuff your</p> <p>22 heard at general conferences --</p> <p>23 MR. LEDLIE: Object to the form.</p> <p>24 Q. -- that you were attending?</p> <p>25 MR. LEDLIE: Sorry. Object to the</p>	<p style="text-align: right;">Page 60</p> <p>1 what that means is -- do you know what that</p> <p>2 means?</p> <p>3 Q. No. I need you to please explain.</p> <p>4 A. Okay. What that means is they</p> <p>5 have -- they've had their backgrounds completed</p> <p>6 by the federal government, and they have the</p> <p>7 authority -- the same authority as a DEA agent</p> <p>8 to -- for federal investigations.</p> <p>9 We have a general assignment</p> <p>10 detective, Ryan Knight, who's assigned to the</p> <p>11 unit, attached to the unit. And we have</p> <p>12 Lori -- sorry. That would be five. We have</p> <p>13 Lori Baker-Stella, who's assigned to the Drug</p> <p>14 Enforcement Administration under TDS squad,</p> <p>15 Tactical Diversion Squad, for pill diversion.</p> <p>16 Q. Okay. Do -- you described</p> <p>17 Ms. Ingram's specific responsibilities related</p> <p>18 to the evidence. Do any of the other folks</p> <p>19 that you just listed have specific</p> <p>20 responsibilities within the drug unit? Sort of</p> <p>21 distinct responsibilities?</p> <p>22 Let me -- let me try that ques- --</p> <p>23 let me try a --</p> <p>24 A. Yeah.</p> <p>25 Q. -- better question. We'll just</p>
<p style="text-align: right;">Page 59</p> <p>1 form of the question. Misstates testimony.</p> <p>2 A. Correct.</p> <p>3 Q. I'm sorry?</p> <p>4 A. Correct.</p> <p>5 Q. Okay. Do the -- how many</p> <p>6 detectives from the Summit County Sheriff's --</p> <p>7 are there any detectives from the Summit County</p> <p>8 Sheriff's Office who are assigned to the drug</p> <p>9 unit?</p> <p>10 A. Yes.</p> <p>11 Q. How many?</p> <p>12 A. We have Carmen Ingram. She is a</p> <p>13 property officer. She handles all of our</p> <p>14 pieces of property, evidence.</p> <p>15 Q. Okay.</p> <p>16 A. Okay. She tags all the evidence.</p> <p>17 She also assists with stack</p> <p>18 keeping. She's -- she's wonderful. She</p> <p>19 produces the -- puts together the drug</p> <p>20 awareness training videos for DARE, Drug Abuse</p> <p>21 Resistance Education.</p> <p>22 We have two deputies, Bob</p> <p>23 Scalise -- Robert Scalise and Jimmy Fields,</p> <p>24 that are assigned to the unit, and they are</p> <p>25 task force officers attached to the DEA. So</p>	<p style="text-align: right;">Page 61</p> <p>1 take them one by one.</p> <p>2 So Lori Baker-Stella, when you say</p> <p>3 she's assigned to the DEA TDS squad, Tactical</p> <p>4 Diversion Squad, what does that mean and what</p> <p>5 does she -- what does that mean?</p> <p>6 A. There's a -- the Tactical Diversion</p> <p>7 Squad with the DEA just handles doctor</p> <p>8 complaints, pharmacy complaints, prescribing</p> <p>9 complaints, pill -- just pill diversion. And</p> <p>10 so she's assigned to that unit, and they're in</p> <p>11 Cleveland.</p> <p>12 Q. Okay.</p> <p>13 A. So does that -- do you understand?</p> <p>14 Q. Does she -- is she part of the</p> <p>15 Summit County Drug Unit?</p> <p>16 A. She's assigned to the DEA through</p> <p>17 us. I guess if we didn't exist, she wouldn't</p> <p>18 be there, I guess is the best way to put that.</p> <p>19 Q. Okay. Do you know what she's doing</p> <p>20 on a daily basis? Does she report to you --</p> <p>21 A. No.</p> <p>22 Q. -- either directly or indirectly?</p> <p>23 A. Not daily, no.</p> <p>24 Q. Okay.</p> <p>25 A. She'll report to the sergeant.</p>

<p style="text-align: right;">Page 62</p> <p>1 Most things -- most people report directly to 2 the sergeant before me. 3 Q. How long has Ms. Baker-Stella -- 4 Det- -- I'm sorry -- Detec- -- Deputy 5 Baker-Stella? 6 A. Yeah, she's a deputy. 7 Q. All right. How long has Deputy 8 Baker-Stella been assigned to that Tactical 9 Diversion Squad? 10 A. I believe she started in February 11 of '13. 12 Q. And was there someone from the 13 sheriff's -- sorry -- from the Summit County 14 Sheriff's Office assigned to that squad before 15 Deputy Baker-Stella? 16 A. I'm trying to remember if someone 17 had left. I don't remember. 18 Q. Okay. Can you give some examples 19 of the types of investigations that Deputy 20 Baker-Stella has been involved in? 21 MR. LEDLIE: Object to the form. 22 Asked and answered. 23 A. I mean, you would have to get any 24 details from Lori Baker-Stella. She -- she had 25 reported -- I think it's in my stats -- like</p>	<p style="text-align: right;">Page 64</p> <p>1 THE VIDEOGRAPHER: Off the record 2 at 9:52 a.m. 3 (A recess was taken.) 4 THE VIDEOGRAPHER: Back on the 5 record at 10:07 a.m. 6 BY MR. BLOCK: 7 Q. Is there an organizational chart 8 for the Summit County Drug Unit? You know, 9 like a piece of paper that -- 10 A. Like a flowchart? 11 Q. Yeah. 12 A. I don't know if we have a 13 flowchart. 14 Q. Okay. What -- you mentioned there 15 were two Summit County Sheriff's Office 16 deputies. I think it was Ms. -- Deputy Scalise 17 and Deputy Fields? 18 A. Correct. 19 Q. And they are also trained by 20 the DEA? Sorry. What -- what's their DEA 21 affiliation? 22 A. They're task force officers. 23 They're -- they're attached to the DEA, so they 24 have Drug Enforcement Administration 25 credentials.</p>
<p style="text-align: right;">Page 63</p> <p>1 three doctors -- doctor investigations and -- 2 and a pharmacy investigation that she had been 3 working on. 4 Q. Okay. Now, she's in Cleveland? 5 A. Uh-huh. 6 Q. Is her -- the scope of where she's 7 investigating, is it limited to Summit County, 8 or is it broader? 9 A. No. No, it's broader. I don't 10 know exactly their territories, but it's 11 broader than Summit County. 12 Q. All right. Going back to the 13 other -- 14 A. Okay. 15 Q. -- folks, but I've lost their 16 names. 17 MR. LEDLIE: We've been going about 18 50 minutes, so whenever we're at a good 19 breaking point, that would be great. 20 MR. BLOCK: Yeah. You want to take 21 a break? 22 MR. LEDLIE: Sure. 23 MR. BLOCK: Fine. We'll -- we'll 24 take a break now. 25 THE WITNESS: Okay.</p>	<p style="text-align: right;">Page 65</p> <p>1 Q. Okay. 2 A. They can -- they can conduct 3 federal investigations. 4 Q. Do they -- are they located at the 5 same building where you work or somewhere -- 6 A. Yes. 7 Q. Okay. And do they have -- given 8 that they are DEA-credentialed, does that -- do 9 they work on different types of projects than 10 the other deputies assigned to the drug unit? 11 A. They -- they share common drug 12 investigations, so I guess the answer would be 13 no. 14 Q. Is there a particular focus for 15 either of those deputies in terms of their -- 16 their work? 17 And by "focus" I -- I mean that in 18 the broadest sense possible, whether that's a 19 particular geographical area within the county 20 or a particular type of drug or type of 21 transaction. 22 A. Well, I mean, our -- our main area 23 of responsibility, obviously, is Summit County. 24 Q. Right. 25 A. So geographically it would be</p>

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1 Summit County.  
 2 Q. Okay.  
 3 A. Sometimes investigations lead out  
 4 of the county. Sometimes we get other task  
 5 forces involved in other states.  
 6 Q. Are there any deputy -- any  
 7 detectives -- do you call them detectives in  
 8 the drug unit?  
 9 A. Yeah.  
 10 Q. The people in the field are the  
 11 detectives; is that right?  
 12 A. Yeah.  
 13 Q. So are there any detectives who are  
 14 supposed to prioritize on particular types of  
 15 drugs?  
 16 A. I -- I mean, we handle all the drug  
 17 complaints. They're all priority.  
 18 Q. Okay. What I was trying to get at  
 19 is if you get a complaint about cocaine use  
 20 somewhere, is there a particular deputy who  
 21 generally gets sent to investigate the cocaine  
 22 complaints as opposed to the meth complaints  
 23 or --  
 24 A. No, but there are detectives that  
 25 are -- like, you brought up cocaine. Like --

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1 like methamphetamine, there are detectives that  
 2 just really enjoy methamphetamine  
 3 investigations, and they're very good at it.  
 4 Or -- or, you know, making a meth lab safe and  
 5 neutralizing it, and some guys really enjoy  
 6 that, so they would be called upon for that and  
 7 giving presentations, things like that.  
 8 Q. Is there anybody within the Summit  
 9 County Drug Unit who's got a particular  
 10 affinity or interest in prescription medication  
 11 investigations?  
 12 A. Well, Lori Baker-Stella is assigned  
 13 to that unit. They're all -- you know, she's  
 14 assigned to the pill diversion unit.  
 15 Q. If -- if the Summit -- if you get a  
 16 report in to your unit that somebody is  
 17 complaining about pill diversion, does that --  
 18 who -- who within the unit deals with that?  
 19 A. Those complaints are generally  
 20 forwarded to Lori Baker-Stella's unit, or  
 21 there's a guy from Akron police named Pat  
 22 Leonard. They'll be given to him.  
 23 Q. And did -- I believe you told me --  
 24 told us that the Summit County Drug Unit is  
 25 co-located with the -- something from Akron.

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1 What --  
 2 A. Akron Narcotics Unit.  
 3 Q. Akron Narcotics Unit. And what  
 4 is -- what does the Akron Narcotics Unit  
 5 consist of?  
 6 MR. LEDLIE: Object to the form.  
 7 You can answer.  
 8 A. It's basically the same as us, but  
 9 just city. They have city jurisdiction.  
 10 They're -- they have a -- they call it a --  
 11 their K9's out of that office. Their street  
 12 narcotics, uniformed patrolmen are out of that  
 13 office, so.  
 14 Q. Who commands that unit?  
 15 A. That is Captain Mike Shearer.  
 16 Q. How -- how long has he been in  
 17 charge of that unit?  
 18 A. I -- I really don't know.  
 19 Q. Was he there when you started?  
 20 A. Yes. Quite a while.  
 21 Q. When you started in 2012, were you  
 22 co-located with the Akron Narcotics Unit?  
 23 A. Yes. In a different location.  
 24 Q. And do you have any -- you  
 25 personally have any involvement with Captain

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1 Shearer or anyone else in the Akron Narcotics  
 2 Unit in terms of coordinating activities?  
 3 A. Yeah. Yes.  
 4 Q. Okay. Describe for -- how do you  
 5 coordinate with the Akron Narcotics Unit?  
 6 A. Well, I mean, we speak daily. His  
 7 office is right next to mine. So I guess I  
 8 don't understand what you mean by how do we  
 9 coordinate. We're all in the same room  
 10 together, and we can freely talk among each  
 11 other, so.  
 12 Q. Does he -- for example, does he  
 13 share with you what the detectives in the Akron  
 14 Narcotics Unit are working on?  
 15 A. On occasion. We try to. Probably,  
 16 you know, we -- we try to share information as  
 17 much as we can so we don't both end up  
 18 investigating the same people and -- and  
 19 organizations.  
 20 Q. Is there a supervisory -- does he  
 21 have a supervisory sergeant or equivalent for  
 22 the Akron Narcotics Unit?  
 23 A. He has a lieutenant, David Garro,  
 24 G-a-r-r-o, who -- he's -- he hasn't been there  
 25 very long. A couple years, maybe.

<p style="text-align: right;">Page 70</p> <p>1 Q. I forget if you told me this. When 2 you started in 2012, was Captain Shearer the 3 one in charge of the Akron Narcotics Unit? 4 A. He was. He had a different 5 lieutenant. 6 Q. Do you remember who that was? 7 A. It was Chip Westfall. 8 Q. Do you know how many detectives are 9 in the Akron Narcotics Unit? 10 A. Specifically, no, I -- I don't. 11 Q. Okay. And is the -- is the 12 geographical focus of the Akron Narcotics Unit 13 activities within the city limits of Akron? 14 A. Yes. 15 Q. Okay. Is -- the city of Akron is 16 within Summit County? 17 A. It is. 18 Q. All right. Does the Summit County 19 Sheriff's Office have any -- have jurisdiction 20 over things that take place within the city 21 limits of Akron? 22 A. It's an interesting question. 23 Summit County Sheriff's Office has jurisdiction 24 in Summit County, and Akron is in Summit 25 County. But as far as -- we wouldn't take over</p>	<p style="text-align: right;">Page 72</p> <p>1 one we're working on, we'll take the lead on 2 the case. 3 Q. Are there any other -- are there 4 any other parts of Summit County, other than 5 the city of Akron, where there's something like 6 the Akron Narcotics Unit that might be taking 7 the lead on the case? 8 A. No, not that I'm aware of. 9 Q. Okay. You're the commander of the 10 Summit County Drug Unit. 11 A. Yes. 12 Q. All right. What are your 13 responsibilities as the commander? 14 (Telephonic interruption.) 15 MR. BLOCK: Bless you. 16 THE WITNESS: I forgot there was 17 people on that phone. 18 MR LEDLIE: There's just a couple. 19 A. It's administrative duties. Don't 20 mistake my role for -- 21 (Telephonic interruption.) 22 MR. BLOCK: Bless you again. 23 THE WITNESS: Bless you. Bless 24 you. 25 MR. BLOCK: Maybe you might want to</p>
<p style="text-align: right;">Page 71</p> <p>1 their investigations or things like that. 2 Q. Are there any other parts of Summit 3 County, other than the city of Akron, where the 4 Summit County Drug Unit sort of defers to 5 another agency to do narcotics investigations? 6 MR. LEDLIE: Object to the form of 7 the question. 8 A. If I understand the question -- 9 maybe I don't understand what you're asking. 10 Q. I might have gotten it wrong, but I 11 understood your testimony if -- if there's 12 narcotics activity within the city limits of 13 Akron, ordinarily, in the first instance, the 14 Akron Narcotics Unit would deal with that? 15 A. It depends. 16 Q. If I rephrase the question to say 17 normally the Akron Narcotics Unit would take 18 the lead on that; is that correct? 19 A. Not all the time. 20 Q. Okay. How do you decide? 21 A. Well, there is no hard and fast 22 rule on -- you know, on who takes the lead. 23 But if they -- how do I explain this? If they 24 have an active complaint they're working on, 25 they take the lead on that case. If we have</p>	<p style="text-align: right;">Page 73</p> <p>1 mute. 2 A. Don't misunderstand my role. I'm 3 not an investigator. I'm an administrator. 4 I -- I collect stats. I make sure they have 5 all the equipment they need to do their job. I 6 try and secure funding through grants, pay the 7 bills. It's administrative duties. 8 Q. If someone on the task force gets 9 in trouble for something they did on the job, 10 are you the person who would ultimately decide 11 whether to refer them for discipline? Is 12 that -- 13 A. It would be -- if it was a Summit 14 County deputy sheriff, yes. If it's an outside 15 agency, we could have them removed, but their 16 home agency would handle their discipline. 17 Q. Who -- if your role is 18 administrative, who -- who is responsible for 19 setting the investigation -- for running the 20 investigations and overseeing the 21 investigations that the unit is handling? 22 A. Well, like, the big investigations, 23 the major drug trafficking organizations, the 24 DEA takes the lead on those. They have the -- 25 the resources and -- and the ability to, you</p>



<p style="text-align: right;">Page 74</p> <p>1 know, go wherever we need to and reach out to 2 other task forces. 3 But I guess ultimately I could shut 4 down an investigation if I wasn't happy with it 5 or didn't like the way it was going or 6 something like that. 7 Q. Who -- so you have veto authority, 8 I guess. 9 A. Well, I -- I -- yeah, I have veto 10 authority, but I have a -- I guess I'm not 11 sure. Not sure what you're asking for. 12 Q. Do -- do you have any 13 involvement -- do you have any role in 14 directing anyone within the drug unit on 15 what -- what they're investigating? 16 A. I guess, you know, if I get a 17 complaint, sure, I'll assign people the 18 complaint or give it to the sergeant to assign 19 the complaint. 20 Q. What kind of complaints come to you 21 directly? 22 A. Directly -- none come to me 23 directly. They'll get forwarded to me from 24 either -- like, we spoke about Carmen Ingran -- 25 Ingram. She manages, like, the Facebook</p>	<p style="text-align: right;">Page 76</p> <p>1 A. She's a sergeant. 2 Q. Okay. Different kind of 3 sergeant -- 4 A. Yeah. 5 Q. -- but -- do you ever -- you didn't 6 serve in the -- 7 A. I did not. 8 Q. -- armed forces? Okay. 9 What is -- what is Courtney 10 Campbell's role? What does she do as an 11 analyst? 12 A. She researches -- like, she's real 13 good at pulling information from, like, places 14 like Facebook, and she gathers data and tries 15 to put together usable information for 16 detectives working the cases. Like associates 17 and -- 18 Q. And she's assigned to the task -- 19 the drug unit through her National Guard 20 status? 21 A. Yeah. 22 Q. How long has she been with the 23 unit? 24 A. Courtney's been there -- she 25 replaced -- she replaced a girl a few years</p>
<p style="text-align: right;">Page 75</p> <p>1 account. And if someone submits a complaint 2 through Facebook, she'll bring it to me, and 3 I'll give it to the sergeant and he'll assign 4 it. We get complaints through Crime Stoppers 5 and things like that. 6 Q. Is there, like, a hotline that 7 people can call? 8 A. Well, our phone number. 9 Q. Okay. 10 A. You know, our general number. 11 Q. Who mans the phone? 12 A. We have a secretary. 13 Q. Are there any other -- any other 14 members of the drug unit who aren't detectives? 15 So that -- by that I was try- -- intending to 16 pick up the secretary. I don't know -- 17 A. Oh, sure. Yeah. 18 Q. -- if there are others. 19 A. She's -- we have a secretary and 20 a -- an analyst provided to us by the Ohio 21 National Guard. 22 Q. Who is the analyst? 23 A. Her name is Courtney Campbell. 24 Q. What does -- do you know what her 25 rank is in the Guard?</p>	<p style="text-align: right;">Page 77</p> <p>1 ago. She's probably been there three years, if 2 I had to guess. 3 Q. The person she -- do you remember 4 the name of the person she replaced? 5 A. I don't. 6 Q. Was that person also affiliated 7 with the National Guard? 8 A. They were. 9 Q. Was there -- has there been a 10 National Guard-affiliated analyst in the drug 11 unit since you've been involved with the drug 12 unit? 13 A. I don't remember when the first one 14 started. No, we didn't have one initially. It 15 might have been a year or two after I took 16 over. 17 Q. And does that mean that her -- that 18 the salary and benefits of the guard analysts 19 have been borne by the National Guard? 20 A. Correct. 21 Q. And you mentioned that if it's a 22 major drug trafficking organization, the DEA 23 will take the lead on it. What did you mean by 24 "a major drug trafficking" organization? 25 A. Well, the major organizations, we</p>



<p style="text-align: right;">Page 78</p> <p>1 use investigative techniques that the DEA has</p> <p>2 the equipment in our office to -- to</p> <p>3 investigate these complaints. We -- we use</p> <p>4 phone -- we listen to phone calls.</p> <p>5 Q. Uh-huh.</p> <p>6 A. Okay. And they -- their equipment</p> <p>7 is in our office. They write the -- the</p> <p>8 affidavit. And it would be an organization</p> <p>9 with five or more people and have ties -- it</p> <p>10 would be a major -- major supply of drugs</p> <p>11 coming into the county. It -- it -- you know.</p> <p>12 Q. What kinds of drugs are we talking</p> <p>13 about?</p> <p>14 MR. LEDLIE: Object to the form of</p> <p>15 the question.</p> <p>16 A. We've investigated cocaine drug</p> <p>17 trafficking organizations, heroin, crystal</p> <p>18 methamphetamine investigations. Large</p> <p>19 quantities.</p> <p>20 Q. To your -- from your memory, have</p> <p>21 you ever investigated a drug trafficking</p> <p>22 organization that was focused on prescription</p> <p>23 medications?</p> <p>24 A. No. No.</p> <p>25 Q. Is there a particular person or</p>	<p style="text-align: right;">Page 80</p> <p>1 he work out of the same building?</p> <p>2 A. No.</p> <p>3 Q. Okay.</p> <p>4 A. He comes in a couple days a week.</p> <p>5 Q. Have you ever spoken with him?</p> <p>6 A. Oh, yeah.</p> <p>7 Q. All right. Do you -- do you have</p> <p>8 any -- does he ever give you updates on what</p> <p>9 DEA is working on related to narcotics</p> <p>10 investigations?</p> <p>11 A. I -- I wouldn't really need updates</p> <p>12 from him. We would give him updates.</p> <p>13 Q. Okay. Well, does he have other</p> <p>14 people reporting to him other than the -- well,</p> <p>15 how many DEA agents are --</p> <p>16 A. Well, it varies. Like I said --</p> <p>17 Q. Okay.</p> <p>18 A. -- it varies from day to day. Just</p> <p>19 four to six.</p> <p>20 Q. Okay. And I guess my question was</p> <p>21 going to be, do you know whether there are</p> <p>22 other DEA agents, other than the four to six in</p> <p>23 the Summit County Drug Unit, who are working on</p> <p>24 narcotics investigations in the -- in this</p> <p>25 region?</p>
<p style="text-align: right;">Page 79</p> <p>1 persons at the DEA who -- you said the DEA</p> <p>2 would take the lead. Who -- who were you</p> <p>3 referring to at the DEA?</p> <p>4 A. Well, one of the special agents in</p> <p>5 the office.</p> <p>6 Q. And is there a DEA supervisor that</p> <p>7 they report to?</p> <p>8 A. Yeah.</p> <p>9 Q. Who is that?</p> <p>10 A. They report to Eric Kochanowski.</p> <p>11 Q. With a K? With a C?</p> <p>12 A. With a -- with a K, but please</p> <p>13 don't ask me to spell it.</p> <p>14 Q. Okay.</p> <p>15 A. And then there's also Keith Martin,</p> <p>16 I believe, is Eric's boss.</p> <p>17 Q. Okay. And who is Mr. Kochanowski?</p> <p>18 Do you know what this title?</p> <p>19 A. I believe they call him a RAC.</p> <p>20 Q. A what?</p> <p>21 A. RAC, resident agent in charge.</p> <p>22 Q. Okay.</p> <p>23 A. The guys that work in our office</p> <p>24 that are special agents.</p> <p>25 Q. Is he -- does Mr. Kochanowski, does</p>	<p style="text-align: right;">Page 81</p> <p>1 A. In Summit County?</p> <p>2 Q. Sure.</p> <p>3 A. Do I know of other DEA agents?</p> <p>4 Q. Yes.</p> <p>5 A. No, I -- I don't believe so.</p> <p>6 Q. Okay. Are there any -- does the</p> <p>7 drug unit have any -- do you have staff</p> <p>8 meetings?</p> <p>9 A. We do.</p> <p>10 Q. Is there a regularly scheduled</p> <p>11 staff meeting?</p> <p>12 A. The -- with the detectives?</p> <p>13 Q. Sure. I want to talk about all</p> <p>14 kinds of meetings, so.</p> <p>15 A. Oh, okay. Okay. So --</p> <p>16 MR. LEDLIE: Object to the form of</p> <p>17 the question.</p> <p>18 A. Okay.</p> <p>19 Q. Let's start with the detectives.</p> <p>20 Are there --</p> <p>21 A. I mean, we meet daily, because</p> <p>22 we're all in the same room. The guys all have</p> <p>23 lunch together. They discuss cases daily. So</p> <p>24 if that's what you're asking.</p> <p>25 Q. Well, is -- and is there any -- is</p>

<p style="text-align: right;">Page 82</p> <p>1 there a set time where you're -- where you get  2 briefed, either by the detectives or the  3 sergeant or somebody else, on what's going on?  4 Or is it just if you happen --  5 yeah, I'll end my question there.  6 Let me read it back. Sorry.  7 Is there any -- a set time where  8 you get briefed, either by the detectives or  9 the sergeant or somebody else, on what they're  10 working on?  11 A. If you're asking --  12 MR. LEDLIE: Object to the form of  13 the question.  14 You can answer.  15 THE WITNESS: Sorry.  16 A. If you're asking if it's Tuesdays  17 at 10:00, then, no. It's -- it's daily, I  18 guess, would be the best way to answer that.  19 Q. Is there a -- you know, I've seen  20 on the TV shows everybody gets in the room in  21 the morning and they get their assignments and  22 then off they go. Is it like that?  23 A. No.  24 Q. Okay. How -- describe it for me.  25 A. Well, the sergeants -- it's Mike</p>	<p style="text-align: right;">Page 84</p> <p>1 A. Yeah.  2 Q. How long have you had that phone?  3 A. This particular phone?  4 Q. Sure.  5 A. Maybe a year and a half.  6 Q. What is HIDTA you mentioned?  7 A. High Intensity Drug Trafficking  8 Area.  9 Q. What does that mean?  10 A. Summit County was designated a high  11 intensity drug trafficking area. And -- and I  12 don't know what year that -- this came about by  13 congress in the '80s. So to be a designated  14 HIDTA area, you have to designate resources to  15 investigate drug complaints.  16 We're -- our highway system, we're  17 geographically located within -- with our state  18 routes between source cities of supply, so it's  19 in the federal -- the president's budget. He  20 allocated money for HIDTAs, HIDTA areas in the  21 United States. So HIDTA provides us some  22 funding annually for our investigations.  23 Q. And when you say "provides us with  24 funding," do you mean "us" is the Summit County  25 Drug Unit? Who's "us"?</p>
<p style="text-align: right;">Page 83</p> <p>1 Shearer's office, my office, and then my  2 sergeant's office. We just -- we meet and  3 talk.  4 Q. Okay.  5 A. And he tells me what they've been  6 doing, what they have planned, what's going on  7 at night. He gives me the updates and...  8 Q. What if you're not in the office  9 and someone needs to get ahold of you and give  10 you an update; how do they do that?  11 A. Call me. Call me.  12 Q. Do you have a -- do you have a  13 county --  14 A. I do.  15 Q. -- a county-issued cell phone?  16 A. Well, it's actually issued through  17 HIDTA.  18 Q. Okay.  19 A. So it's a federal --  20 Q. I'll come back to HIDTA.  21 A. Okay.  22 Q. But you have a cell phone.  23 Do you get -- do you ever get text  24 messages related to the drug unit on your -- on  25 that phone?</p>	<p style="text-align: right;">Page 85</p> <p>1 A. The Summit County Drug Unit, Akron  2 Narcotics Unit are given an annual budget, and  3 we split it down the middle.  4 Q. You're given an annual budget from  5 HIDTA?  6 A. Correct.  7 Q. All right. Do you know  8 approximately how much that is?  9 A. I can give you a close estimate --  10 Q. Great.  11 A. -- of, like, in the \$160,000 range  12 that we split.  13 Q. 80/80? Or --  14 A. 80/80? Oh, yeah, yeah, yeah.  15 Q. Okay. Is there any -- do you have  16 any reporting obligations to HIDTA?  17 A. Yes.  18 Q. To whom do you report?  19 A. Quarterly we report our stats to  20 Peg Leighter from HIDTA, and she ultimately  21 reports to a man named Derek Siegle.  22 Q. Peg Leighter?  23 A. Uh-huh.  24 Q. What's her job?  25 A. I don't know exactly her duties,</p>

<p style="text-align: right;">Page 86</p> <p>1 but I believe she's an assistant --</p> <p>2 administrative assistant to the director of</p> <p>3 HIDTA.</p> <p>4 Q. And is Mr. Siegle the director?</p> <p>5 A. I believe he's considered the</p> <p>6 director of HIDTA.</p> <p>7 Q. Where are they -- do you know where</p> <p>8 their offices are located?</p> <p>9 A. In Cleveland.</p> <p>10 Q. I'm sorry?</p> <p>11 A. Cleveland.</p> <p>12 Q. Okay. I was asking you about</p> <p>13 meetings. You've described --</p> <p>14 A. Okay.</p> <p>15 Q. -- how you meet or talk with the</p> <p>16 detectives.</p> <p>17 How about, are there more formal --</p> <p>18 A. Yes.</p> <p>19 Q. -- staff meetings or -- are there</p> <p>20 more formal meetings at the drug unit?</p> <p>21 A. Yes.</p> <p>22 Q. What kinds?</p> <p>23 A. We have board meetings. When an</p> <p>24 agency assigns a detective, their chief sits on</p> <p>25 the board of directors for the drug unit. So</p>	<p style="text-align: right;">Page 88</p> <p>1 Q. What do you mean by "the fleet"?</p> <p>2 A. You know, cars. We have 30 or so</p> <p>3 vehicles that, you know, on occasion will be</p> <p>4 crashed or we'll need to purchase a new car or</p> <p>5 something like that.</p> <p>6 Q. Do you transmit the agenda to the</p> <p>7 members of the board in advance of the meeting?</p> <p>8 A. I don't. My secretary does.</p> <p>9 Q. Okay. Is that the same secretary</p> <p>10 as the secretary for the drug unit, or do you</p> <p>11 have an individual secretary?</p> <p>12 A. No. That's the secretary for the</p> <p>13 drug unit.</p> <p>14 Q. What's his or her name?</p> <p>15 A. Her name is Stacey Milkey.</p> <p>16 Q. And how long has she been the</p> <p>17 secretary?</p> <p>18 A. She was there before me. I don't</p> <p>19 know exactly how long she's been there.</p> <p>20 Q. And does she send them out by</p> <p>21 e-mail?</p> <p>22 A. She does.</p> <p>23 Q. All right. Are -- are the meetings</p> <p>24 transcribed or recorded?</p> <p>25 A. Not transcribed like this, but</p>
<p style="text-align: right;">Page 87</p> <p>1 quarterly -- and the sheriff is the chairman of</p> <p>2 the board. So we meet quarterly.</p> <p>3 Q. Where do you meet?</p> <p>4 A. At the drug unit.</p> <p>5 Q. I'm not supposed to ask you where</p> <p>6 that is. Can I ask what -- the location is</p> <p>7 supposed to be confidential; is that right?</p> <p>8 A. Yeah.</p> <p>9 Q. Is it, in reality?</p> <p>10 MR. LEDLIE: Object to the form of</p> <p>11 the question.</p> <p>12 A. I hope.</p> <p>13 Q. You meet quarterly. So that's --</p> <p>14 how many people are on the board?</p> <p>15 A. There's approximately 15 or 16.</p> <p>16 Q. Are agendas prepared for the board</p> <p>17 meeting?</p> <p>18 A. Yes.</p> <p>19 Q. Who prepares those?</p> <p>20 A. I do.</p> <p>21 Q. How do you determine what to put on</p> <p>22 the agenda?</p> <p>23 A. I've kind of made a boilerplate</p> <p>24 agenda that just covers staff, the fleet, grant</p> <p>25 funding, and investigations.</p>	<p style="text-align: right;">Page 89</p> <p>1 they'll -- the highlights are -- Carmen Ingram</p> <p>2 and Stacey will prepare, like, the minutes, and</p> <p>3 they'll hit the important -- the things we vote</p> <p>4 on and things like that.</p> <p>5 Q. And have there been regular --</p> <p>6 regular quarterly meetings of the board of</p> <p>7 directors since you've been the commander of</p> <p>8 the drug unit?</p> <p>9 A. I would say so. We may have missed</p> <p>10 one. Like I'm missing this one today. You</p> <p>11 know, I have to resche- -- there was one</p> <p>12 scheduled for today I had to change, so I don't</p> <p>13 have a date yet.</p> <p>14 Q. Okay. What other -- are there any</p> <p>15 other formal meetings that the drug unit has?</p> <p>16 A. I don't believe so.</p> <p>17 Q. How about in your -- in your role</p> <p>18 as the commander of the drug unit, are there</p> <p>19 any meetings that you go to on a --</p> <p>20 A. Yes.</p> <p>21 Q. -- regular basis?</p> <p>22 A. Yes.</p> <p>23 Q. What? Describe those, please.</p> <p>24 A. So the commanders are all in an</p> <p>25 organization called OTFCA, it's Ohio Task Force</p>

<p style="text-align: right;">Page 90</p> <p>1 Commanders Association, and we meet quarterly.  2 Try to meet quarterly.  3 Q. Where?  4 A. It's in various places throughout  5 the state. They try and move it around so it's  6 convenient for everyone.  7 Q. I'm sorry. I'll come back to -- I  8 want to come --  9 A. Okay.  10 Q. -- back to OTFCA.  11 A. Sure.  12 Q. I didn't ask enough questions about  13 the --  14 A. Okay.  15 Q. -- drug unit board meeting.  16 Are there any federal -- anybody  17 affiliated with the federal government who's on  18 the board of the Summit County Drug Unit?  19 A. Yes.  20 Q. Who?  21 A. Eric Kochanowski.  22 Q. Okay.  23 A. And sometimes Keith Martin will  24 come. Charlie Johnston from the FBI will  25 attend. I believe that's it, federal.</p>	<p style="text-align: right;">Page 92</p> <p>1 A. Yeah. They have an office in  2 Akron.  3 Q. Okay. Are they -- is there someone  4 who's, like, an FBI agent who's affiliated with  5 but not directly assigned to the --  6 MR. LEDLIE: Counsel, I received a  7 call this week from Department of Justice that  8 had some real concerns about questions  9 involving federal officers and their  10 identities, and so I'm going to request on the  11 record and note for you that I've gotten that  12 call. They're supposed to be reaching out to  13 defense liaison to talk about these issues.  14 But I just want to make clear that  15 by allowing this testimony, I'm in no way  16 representing the United States government,  17 their interest, their ability to seek  18 redactions or shut down this process in any  19 way.  20 And because they've contacted me  21 and alerted me to the problem, I wanted to  22 alert you that they've reached out to me. I  23 understand they're working with defendants, as  24 well.  25 But I'm not going to instruct him</p>
<p style="text-align: right;">Page 91</p> <p>1 Q. Is there an FBI agent assigned to  2 the drug unit?  3 A. Not any longer.  4 Q. Has there been in the past?  5 A. Yeah.  6 Q. When did that -- was there one --  7 was there an FBI agent when you started in  8 2012?  9 A. There was.  10 Q. When did -- when -- when did that  11 person -- why -- sorry. I'll get it out.  12 A. Okay. Take your time.  13 Q. When -- do you recall when it was  14 that there was no longer an FBI person assigned  15 to the task force?  16 A. Yes. When we moved locations. It  17 must have been around '14 or '15. I'm sorry.  18 I don't remember exactly when we moved. But we  19 moved locations, they had trouble -- they --  20 they couldn't get their -- their clearance is  21 top secret, FBI. They couldn't get their lines  22 ran into to the new building for their computer  23 system, so they just work out of their Akron  24 office.  25 Q. Work out of the Akron office?</p>	<p style="text-align: right;">Page 93</p> <p>1 not to answer, but I do want to note for the  2 record that that conversation has taken place.  3 Q. All right. Do you remember my  4 question?  5 A. No. Sorry.  6 Q. Is there somebody with the FBI  7 who's, like, on -- affiliated with or someone  8 that the -- the drug unit calls today if they  9 have an issue where they think they need the  10 FBI's help?  11 Let me -- let me -- let me take  12 that question back.  13 When there was an FBI person --  14 A. Yeah.  15 Q. -- assigned to the unit, what did  16 that person do?  17 A. Same drug investigations.  18 Q. Okay.  19 A. They virtually do the same thing  20 that the DEA does when they were attached to  21 us.  22 Q. Okay. Is there somebody now that  23 if you needed FBI assistance, that the drug  24 unit would call?  25 A. I could call, yes, of course.</p>

<p style="text-align: right;">Page 94</p> <p>1 Q. Okay. Who would you --</p> <p>2 A. I'd call Charlie Johnston.</p> <p>3 Q. Okay. Anybody from the State of</p> <p>4 Ohio on the board of directors of the drug</p> <p>5 unit?</p> <p>6 A. We have a -- we have an Ohio State</p> <p>7 highway patrolman. I guess technically his</p> <p>8 boss is the State of Ohio, so, yes.</p> <p>9 Q. Is there someone from the Ohio</p> <p>10 State Highway Patrol who's assigned to the drug</p> <p>11 unit?</p> <p>12 A. Yes.</p> <p>13 Q. There's a detective or --</p> <p>14 A. Yes.</p> <p>15 Q. Okay. What's that person's name?</p> <p>16 A. Nick Goodnite.</p> <p>17 Q. Does Detective Goodnite have any</p> <p>18 area of focus that's different from the other</p> <p>19 detectives?</p> <p>20 A. No.</p> <p>21 Q. How long has there been someone</p> <p>22 from the Ohio State Highway Patrol assigned to</p> <p>23 the drug unit?</p> <p>24 A. Probably three years.</p> <p>25 Q. How did -- why did that start, if</p>	<p style="text-align: right;">Page 96</p> <p>1 first guy I talked to, but then I talked to</p> <p>2 Dick Meadows, and we were just bouncing ideas</p> <p>3 back and forth. And it's just good to have</p> <p>4 them on the unit. They're really good at</p> <p>5 traffic stuff, traffic investigations. And --</p> <p>6 and if we need cars stopped or if they have --</p> <p>7 they bring a lot of support to the unit. I</p> <p>8 mean, they have helicopters and airplanes and</p> <p>9 manpower.</p> <p>10 Q. So you think it's improved the</p> <p>11 effectiveness of the unit having someone from</p> <p>12 the highway patrol assigned to the unit?</p> <p>13 A. It's helped, sure.</p> <p>14 Q. Do you know why they hadn't done</p> <p>15 that before? Why --</p> <p>16 MR. LEDLIE: Object to the form.</p> <p>17 Speculation.</p> <p>18 A. Okay. I would be giving you an</p> <p>19 opinion.</p> <p>20 Q. We'll take it, please.</p> <p>21 MR. LEDLIE: Object to the form.</p> <p>22 He's here as a fact witness, not as an expert</p> <p>23 or opinion testimony.</p> <p>24 THE WITNESS: Does that mean I</p> <p>25 answer it?</p>
<p style="text-align: right;">Page 95</p> <p>1 you know?</p> <p>2 A. They're one of the agencies I try</p> <p>3 to recruit into the drug unit.</p> <p>4 Q. Who did you talk to to make that</p> <p>5 happen?</p> <p>6 A. I believe at the time it was a guy</p> <p>7 named Dick Meadows.</p> <p>8 Q. What was his job?</p> <p>9 A. He was a -- I don't know what rank</p> <p>10 he carried in the Ohio State Highway Patrol.</p> <p>11 He's no longer there. He works for Department</p> <p>12 of Public Safety now. But I don't remember his</p> <p>13 rank. Probably a lieutenant or captain or</p> <p>14 something like that.</p> <p>15 Q. And what was the pitch to</p> <p>16 Mr. Meadows about why the Ohio State Highway</p> <p>17 Patrol should join the task force -- join the</p> <p>18 drug unit? Excuse me.</p> <p>19 A. I mean --</p> <p>20 Q. Is it both a drug unit and a task</p> <p>21 force?</p> <p>22 A. Yeah. It's a drug task force.</p> <p>23 Q. Okay.</p> <p>24 A. I'd -- I'd say we kind of pitched</p> <p>25 each other. You know, I don't remember the</p>	<p style="text-align: right;">Page 97</p> <p>1 Q. No, you can answer. Yeah.</p> <p>2 MR. LEDLIE: If you -- if you can</p> <p>3 answer the question without guessing or</p> <p>4 speculating, go ahead.</p> <p>5 A. No. It would be speculation. It</p> <p>6 would be speculation. I'm sorry.</p> <p>7 Q. The OTCFA -- OTFCA?</p> <p>8 A. Uh-huh.</p> <p>9 Q. Which way is it?</p> <p>10 A. It's OTFCA.</p> <p>11 Q. OTFCA.</p> <p>12 A. Ohio Task Force Commanders</p> <p>13 Association.</p> <p>14 Q. Who -- what task force are we</p> <p>15 talking about that are members of OTFCA? I</p> <p>16 assume one is the Summit County Drug Unit?</p> <p>17 A. Yeah.</p> <p>18 Q. All right.</p> <p>19 A. If you're going to ask me to name</p> <p>20 them all in the state, I can't.</p> <p>21 Q. No. Just, can you describe them --</p> <p>22 A. Sure.</p> <p>23 Q. Are there any task force other than</p> <p>24 drug- or narcotics-related task force that are</p> <p>25 part of --</p>



<p style="text-align: right;">Page 98</p> <p>1 A. No. Not that I'm aware of.</p> <p>2 Q. Okay. And you try to meet</p> <p>3 quarterly?</p> <p>4 A. Yes.</p> <p>5 Q. All right. Who is the -- is there</p> <p>6 a head of -- who -- who runs that?</p> <p>7 A. Yeah, there is. It was a guy by</p> <p>8 the name of Jeff Orr from Trumbull County, but</p> <p>9 he was replaced recently. And I -- the name</p> <p>10 eludes me now, the guy that took his place.</p> <p>11 Q. Or where he's from?</p> <p>12 A. I think it's Jeff Solic. I'm not</p> <p>13 exactly sure which task force he's from.</p> <p>14 Q. What is the -- what does OTFCA do?</p> <p>15 A. We just, quarterly, get together,</p> <p>16 exchange information. And it's a -- it's just</p> <p>17 a collaboration-type event.</p> <p>18 Q. Are there agendas prepared in</p> <p>19 advance?</p> <p>20 A. There are.</p> <p>21 Q. Who prepares those?</p> <p>22 A. It was Jeff Orr, but now I believe</p> <p>23 it's a guy named Solic.</p> <p>24 Q. Have you ever -- are there -- are</p> <p>25 the officers or leaders of OTFCA people who are</p>	<p style="text-align: right;">Page 100</p> <p>1 Q. Who?</p> <p>2 A. I took -- I try to make the --</p> <p>3 advise the sergeant to go, the field</p> <p>4 investigator -- or the field supervisor to go.</p> <p>5 And I don't know if I've ever taken anyone else</p> <p>6 with me. I don't think so.</p> <p>7 Q. Anybody from the federal government</p> <p>8 at these meetings?</p> <p>9 A. No. They're not a part of OTFCA.</p> <p>10 Q. Back to the drug unit board of</p> <p>11 directors. Is there anybody from the City of</p> <p>12 Akron on that board?</p> <p>13 A. Yes.</p> <p>14 Q. Who?</p> <p>15 A. The chief. The chief of Akron.</p> <p>16 Q. Okay. So is there an Akron police</p> <p>17 detective assigned to the Summit County Drug</p> <p>18 Unit?</p> <p>19 A. Yes.</p> <p>20 Q. What's that person's name?</p> <p>21 A. Bryan Callahan.</p> <p>22 Q. And that's distinct from the Akron</p> <p>23 Police Department detectives who are assigned</p> <p>24 to the Akron Narcotics Unit?</p> <p>25 A. Are you asking me in a chain of</p>
<p style="text-align: right;">Page 99</p> <p>1 also task force commanders?</p> <p>2 A. Yes.</p> <p>3 Q. All right. And are the -- how are</p> <p>4 they -- are they elected or nominated, or how</p> <p>5 do they get chosen?</p> <p>6 A. You know, they're elected. I don't</p> <p>7 know if I've participated in an election, but I</p> <p>8 believe they're elected.</p> <p>9 Q. Have you ever held any --</p> <p>10 A. No.</p> <p>11 Q. -- position within OTFCA of any</p> <p>12 sort?</p> <p>13 A. No.</p> <p>14 Q. Other than being a member.</p> <p>15 A. No. Hylton Baker was a -- I</p> <p>16 believe he ran it prior to Jeff Orr.</p> <p>17 Q. And so I think you've answered my</p> <p>18 next question. Was -- was OTFCA in place when</p> <p>19 you became the drug unit --</p> <p>20 A. Yeah.</p> <p>21 Q. -- commander in 2012?</p> <p>22 All right. And does anybody from</p> <p>23 the drug unit, other than you, go to those</p> <p>24 meetings?</p> <p>25 A. Yeah. Yes.</p>	<p style="text-align: right;">Page 101</p> <p>1 command? Yeah, I guess I'm not sure what</p> <p>2 you're asking.</p> <p>3 Q. You're co-located with the Akron</p> <p>4 Narcotics Unit.</p> <p>5 A. Yeah.</p> <p>6 Q. Some of the people in the building</p> <p>7 don't have any affiliation -- official</p> <p>8 affiliation with the Summit County Drug Unit;</p> <p>9 is that right?</p> <p>10 MR. LEDLIE: Object to the form.</p> <p>11 Q. They're only -- maybe I'm</p> <p>12 misunderstanding, but I -- I thought, like,</p> <p>13 half the building was working for the Akron</p> <p>14 Narcotics Unit.</p> <p>15 A. Yeah.</p> <p>16 Q. Is that right?</p> <p>17 A. Yeah.</p> <p>18 Q. And the other half is working for</p> <p>19 the Summit County Drug Unit?</p> <p>20 A. Correct.</p> <p>21 Q. And Deputy Callahan, which side of</p> <p>22 the line? Who does he work for?</p> <p>23 A. Well, he's assigned to the Summit</p> <p>24 County Drug Unit through Akron --</p> <p>25 Q. Okay.</p>



<p style="text-align: right;">Page 102</p> <p>1 A. -- Police Department, but he has to 2 follow two chains of command, I -- I guess is 3 what I'm saying. 4 Q. And anybody who's on -- assigned to 5 the task force, basically, is going to have two 6 chains of command. 7 A. Correct. 8 Q. They have the drug unit chain of 9 command and they have the chain of command from 10 their originating organization? 11 A. Yes. 12 Q. All right. But I'm just trying to 13 figure out, Detective Callahan is the only 14 one -- the only Akron Police Department 15 detective who has a dual reporting; is that 16 right? 17 A. Yeah. He's actually -- he's a DEA 18 task force officer, as well. 19 Q. Oh. Just must spend all day 20 reporting to people. 21 A. He does. He's pretty busy. 22 Q. Is there anyone from the Summit 23 County Sheriff's Office who is assigned to the 24 Akron Narcotics Unit? 25 A. No.</p>	<p style="text-align: right;">Page 104</p> <p>1 assigned to attend those meetings? 2 A. She's probably been going since -- 3 probably since 2013, I imagine. 4 Q. Was there anybody assigned to -- 5 was -- did that task force exist before 2013? 6 A. I believe it was started by another 7 organization. I couldn't tell you exactly. I 8 don't know. 9 Q. When you started with the drug unit 10 in 2012, was there anyone affiliated with the 11 drug unit who had any role with the Summit 12 County Opiate Task Force? 13 A. I don't know. 14 Q. Why did you assign Deputy 15 Stella-Baker to that task force -- or to go to 16 those meetings? 17 A. She -- they -- they discussed -- I 18 believe it was the things they discussed, 19 opioids and -- I don't remember exactly why I 20 picked her. 21 Q. Does she have any responsibility to 22 keep you informed of what they're talking about 23 at that task -- task force? 24 A. Yeah. You know, in those meetings, 25 the sheriff attends them, and my boss will</p>
<p style="text-align: right;">Page 103</p> <p>1 Q. All right. I still think it was a 2 valid question, though. 3 All right. Are there any other 4 organizations where -- that you go to meetings 5 in your role as the head of the Summit County 6 Drug Unit? 7 A. I'm trying to remember here. I 8 don't know of any official organizations that 9 I'm involved with. 10 Q. Okay. Is there something called 11 the Summit County Opiate Task Force? 12 A. Yes. 13 Q. What's that? 14 A. It's a -- it's a collaboration of 15 judges, mental health workers, probation 16 officers, law enforcement that meet quarterly. 17 Q. Are you at all involved with that? 18 A. I send someone to that. 19 Q. I'm sorry? 20 A. I -- I assign someone to attend 21 that. 22 Q. Who? 23 A. Lori Stella-Baker -- Lori 24 Baker-Stella. 25 Q. Okay. How long has she been</p>	<p style="text-align: right;">Page 105</p> <p>1 attend them, too, so. 2 Q. Your boss is Inspector Rhoades? 3 A. Inspector Rhoades, yeah. 4 Q. Okay. 5 A. So I've been to a couple, but not 6 every time. 7 Q. What do -- what do you understand 8 the mission of the Summit County Opiate Task 9 Force to be? 10 A. Treatment. I believe they focus in 11 on treatment, and they -- my -- my main -- I 12 believe it's treatment is the main focus of 13 their organization. Recovery. 14 Q. Treatment and recovery from what? 15 A. Opioids, alcohol. 16 Q. Opioids -- 17 A. I believe alcohol, drug addiction, 18 and -- 19 Q. Okay. I'm sorry. I'm going -- 20 A. No. That's okay. I'm not real 21 familiar with that organization. 22 Q. All right. Any other -- are there 23 any other organizations with which the Summit 24 County Drug Unit has -- has involvement in 25 terms of, you know, sending someone to regular</p>

<p style="text-align: right;">Page 106</p> <p>1 meetings?</p> <p>2 A. I don't believe so.</p> <p>3 Q. You testified earlier about the</p> <p>4 drug unit's mission. With -- is there a</p> <p>5 particular priority for the drug unit today,</p> <p>6 within that mission?</p> <p>7 MR. LEDLIE: Object to the form of</p> <p>8 the question.</p> <p>9 A. When you're asking priority, are</p> <p>10 you asking drugs in particular?</p> <p>11 Q. Sure. If -- sure.</p> <p>12 A. I guess I don't know what you're</p> <p>13 asking.</p> <p>14 Q. Let's take it -- is there a</p> <p>15 particular drug or type of drugs that the unit</p> <p>16 is focused on today?</p> <p>17 A. No.</p> <p>18 Q. Is the -- and the mission is to --</p> <p>19 to dismantle -- identify and dismantle illegal</p> <p>20 drug activity; is that right?</p> <p>21 A. Drug trafficking organizations,</p> <p>22 yes.</p> <p>23 Q. Drug trafficking organizations.</p> <p>24 Okay.</p> <p>25 So whether it's a marijuana or --</p>	<p style="text-align: right;">Page 108</p> <p>1 Q. When you started in 2012, what were</p> <p>2 the -- was it different in terms of the most</p> <p>3 popular or the most activity in terms of types</p> <p>4 of drugs?</p> <p>5 A. It was the -- cocaine has always</p> <p>6 been popular. It was the one-pot meth labs,</p> <p>7 the home methamphetamine cooks.</p> <p>8 Q. So less now of the one-pot labs --</p> <p>9 and forgive me if you told us this earlier --</p> <p>10 and more of crystal meth?</p> <p>11 A. That's correct.</p> <p>12 Q. All right. And more fentanyl now</p> <p>13 than there used to be.</p> <p>14 A. That's correct.</p> <p>15 Q. What is fentanyl?</p> <p>16 A. Synthetic opioid.</p> <p>17 Q. Where does it come from?</p> <p>18 MR. LEDLIE: Object to the form.</p> <p>19 You can answer.</p> <p>20 A. I know where some comes from.</p> <p>21 Q. What -- where?</p> <p>22 A. I know they manufacture it in labs</p> <p>23 in China, illicit labs in Mexico. I don't know</p> <p>24 where it all comes from. I wish I did.</p> <p>25 Q. And the crystal meth, where is --</p>
<p style="text-align: right;">Page 107</p> <p>1 trafficking organization or a fentanyl</p> <p>2 trafficking organization, sort of equal</p> <p>3 priority?</p> <p>4 A. Sure. They're all equal, equally</p> <p>5 important.</p> <p>6 Q. Okay. Has that always been the</p> <p>7 case?</p> <p>8 MR. LEDLIE: Object to the form.</p> <p>9 A. Has -- has what always been the</p> <p>10 case?</p> <p>11 Q. Has it always been the case that</p> <p>12 all -- whatever -- all types of illegal drugs</p> <p>13 are of equal priority for the unit?</p> <p>14 A. I'd say that's a fair statement.</p> <p>15 Q. Okay. And is there a particular</p> <p>16 drug or type of drugs that you're see- -- that</p> <p>17 today you're seeing increased activity or more</p> <p>18 activity as compared to other drugs?</p> <p>19 A. Yeah.</p> <p>20 Q. And what are the -- what drug or</p> <p>21 drugs?</p> <p>22 A. We're seeing larger and larger</p> <p>23 quantities of crystal methamphetamine and</p> <p>24 fentanyl, and cocaine has always been very</p> <p>25 popular in Summit County.</p>	<p style="text-align: right;">Page 109</p> <p>1 do you have a sense of where that's coming</p> <p>2 from?</p> <p>3 A. Yeah. I believe it's coming from</p> <p>4 Mexico.</p> <p>5 Q. And how is it getting -- the</p> <p>6 fentanyl, how is the fentanyl getting to Summit</p> <p>7 County?</p> <p>8 A. It comes in the county in many</p> <p>9 ways. By carrier -- you know, postal carriers.</p> <p>10 Comes by -- through the southern border. Comes</p> <p>11 in any way you can imagine.</p> <p>12 Q. How about for the crystal meth?</p> <p>13 A. That's the same way. The same</p> <p>14 modes of transportation.</p> <p>15 Q. How does -- if the -- how does the</p> <p>16 drug unit go about trying to identify and stop</p> <p>17 fentanyl-related activity?</p> <p>18 A. We -- we build a case against the</p> <p>19 distributors by, you know, obtaining a source</p> <p>20 of information or a confidential informant, and</p> <p>21 we build our case from there. It might turn</p> <p>22 into a -- a phone -- a wiretap case or</p> <p>23 something like that. We do surveillance. We</p> <p>24 do all kinds of things.</p> <p>25 Q. And when you said "the</p>

<p style="text-align: right;">Page 110</p> <p>1 distributors," who do you -- who are you 2 referring to? 3 A. The cartels in Mexico, I believe, 4 are big distributors of -- of crystal 5 methamphetamine. 6 Q. Okay. And we -- how about for -- I 7 was asking about fentanyl, although is it the 8 same -- 9 A. Oh, I'm sorry. 10 Q. -- is it any different for crystal 11 meth as it is for fentanyl, in terms of how 12 they try to go about identifying it and 13 stopping it? 14 A. I don't believe so. It's all the 15 same. 16 Q. Okay. So you get a -- try to get a 17 confidential informant who will tell you this 18 is where -- this is who's selling it, for 19 example, or this is where that person is 20 getting it from, is the kind of information 21 you're trying to get from the informant? 22 A. Yeah. I mean, how much -- how deep 23 into, like, our modes and tactics do we have to 24 go. I mean -- 25 Q. Just trying to get a general sense.</p>	<p style="text-align: right;">Page 112</p> <p>1 people are indicted. 2 Q. So fent- -- fentanyl -- we can 3 agree fentanyl is an illegal narcotic? 4 MR. LEDLIE: Object to the form. 5 A. Well, I believe there are legal -- 6 it can be prescribed. 7 Q. Okay. 8 A. If -- if that's what you're asking. 9 Q. Let me try to rephrase the 10 question. The type of fentanyl activity that 11 you're trying to identify and stop in Summit 12 County, that's -- 13 A. Illicit? 14 Q. -- illegal, non-prescription 15 fentanyl; is that right? 16 A. Sure. 17 Q. Okay. And -- and crystal meth is 18 not a prescription medication? 19 A. No. 20 Q. All right. Would you agree that 21 heroin represents the greatest drug threat 22 today to Summit County? 23 A. Heroin? 24 Q. Yes. 25 A. I think it's one of them.</p>
<p style="text-align: right;">Page 111</p> <p>1 A. Okay. Okay. 2 Q. Can you -- can you describe it 3 generally -- 4 A. Yeah. That's -- that's -- 5 Q. -- beyond just "we investigate"? 6 A. Yeah. Sure. That's about right. 7 We -- we get a -- an informant that, you know, 8 can make -- can purchase a larger quantity of 9 methamphetamine or -- or fentanyl, and it 10 starts there, and it moves to the next person 11 in the organization and to the next, and we try 12 to ultimately get to the top of the 13 organization. 14 Q. Has the -- has the drug unit had 15 any success in interdicting fentanyl-related 16 activity? 17 A. I believe so. 18 Q. Can you describe some of that? 19 A. I don't have my stats here with me, 20 but we've seized, I think, some decent 21 quantities of fentanyl. 22 Q. And that's in the context of making 23 an arrest; is that right? Or -- 24 A. Yeah, or it comes from -- at the 25 end of the investigation when they're indicted,</p>	<p style="text-align: right;">Page 113</p> <p>1 Q. What else would you include in 2 that? 3 A. I would include fentanyl and 4 cocaine and crystal methamphetamine. 5 Q. Okay. And is it -- is it the 6 case -- I think I read somewhere that it's the 7 case that sometimes the heroin is laced with 8 the fentanyl? 9 A. That's correct. 10 Q. All right. How about the greatest 11 threats for -- drug threats related to violent 12 crime in Summit County? What are -- what would 13 those be? The same ones? 14 A. Yes. You could throw marijuana in 15 there, too. 16 Q. Okay. And how about the greatest 17 risk for property crimes? The same ones? 18 MR. LEDLIE: Object to the form. 19 A. I really don't know. I mean, I 20 would say there's violence in -- and theft 21 in -- related to all these drugs. 22 Q. Has -- does the drug unit have a -- 23 drug unit have any -- do you have a K9 unit? 24 A. We do. 25 Q. Is that part of the Summit County</p>

<p style="text-align: right;">Page 114</p> <p>1 Drug Unit or --</p> <p>2 A. It's the University of Akron</p> <p>3 officer that's assigned to the unit. The</p> <p>4 sheriff's office purchased the -- the K9 and</p> <p>5 paid for the training.</p> <p>6 Q. And what is the -- what does the K9</p> <p>7 person do? Where are they focused, if</p> <p>8 anywhere?</p> <p>9 A. He goes to FedEx, focus in on</p> <p>10 packages. And we use him on traffic stops and</p> <p>11 things like that.</p> <p>12 Q. How long has there been a K9</p> <p>13 assigned -- a K9 part of the drug unit?</p> <p>14 A. There was a K9 before I got there.</p> <p>15 Keith Gowens he -- he had a K9. He retired.</p> <p>16 And there might have been a very small gap,</p> <p>17 maybe a year, and then we got Nick -- Nick Gray</p> <p>18 assigned to K9 after Keith Gowens' retirement.</p> <p>19 Q. What's the name of the K9?</p> <p>20 A. Hoppa.</p> <p>21 Q. Hoppa? Okay.</p> <p>22 Do you have an understanding of</p> <p>23 whether fentanyl is more or less potent than</p> <p>24 heroin, for example?</p> <p>25 A. I've read that it's more potent.</p>	<p style="text-align: right;">Page 116</p> <p>1 Q. Okay.</p> <p>2 A. It's a lot.</p> <p>3 Q. All right. And do you have a</p> <p>4 sense, within that number, what tranches -- you</p> <p>5 know, the case about -- cocaine cases versus</p> <p>6 heroin versus marijuana cases, how those rank?</p> <p>7 MR. LEDLIE: Object to the form of</p> <p>8 the question.</p> <p>9 A. How they rank?</p> <p>10 Q. In terms of number, magnitude.</p> <p>11 Number of them.</p> <p>12 A. No. I'd be speculating.</p> <p>13 Q. All right. Would -- do the stats</p> <p>14 show that?</p> <p>15 A. I don't think their -- it's broke</p> <p>16 down as -- by number of cases for cocaine,</p> <p>17 fentanyl and -- I think it's just number of</p> <p>18 open cases.</p> <p>19 Q. Okay. Do you keep track of</p> <p>20 closed -- when you close a case, do you keep --</p> <p>21 do you keep a running list of what kind of case</p> <p>22 it was? So, for example, you know that you</p> <p>23 closed 10 cocaine-related cases and 8</p> <p>24 heroin-related cases, or is it --</p> <p>25 A. We don't -- I don't think I -- I</p>
<p style="text-align: right;">Page 115</p> <p>1 Q. Okay. Do you -- do you have a view</p> <p>2 as to which is more dangerous between heroin</p> <p>3 and fentanyl?</p> <p>4 MR. LEDLIE: Object to the form.</p> <p>5 A. I guess I think they're both</p> <p>6 dangerous. I don't -- really wouldn't know how</p> <p>7 to differentiate between them.</p> <p>8 Q. Okay. In terms of the types of</p> <p>9 investigations that the drug unit is, let's</p> <p>10 say, handling now, do you have a sense as to</p> <p>11 how many -- a rough sense of how many different</p> <p>12 investigations your drug unit is handling</p> <p>13 currently?</p> <p>14 A. You mean open cases?</p> <p>15 Q. Sure.</p> <p>16 A. I would have to refer to my stats.</p> <p>17 Q. When you say "your stats," what do</p> <p>18 you mean?</p> <p>19 A. You know, we -- for HIDTA --</p> <p>20 Q. Yes.</p> <p>21 A. -- we talked about earlier,</p> <p>22 quarterly stats, we list on there number of new</p> <p>23 cases opened. It would be purely a guess if I</p> <p>24 tried to tell you how many number of cases are</p> <p>25 open.</p>	<p style="text-align: right;">Page 117</p> <p>1 don't do that.</p> <p>2 Q. Okay.</p> <p>3 A. Yeah.</p> <p>4 Q. Just a drug case --</p> <p>5 A. Yeah.</p> <p>6 Q. -- open, drug case closed?</p> <p>7 A. Because a lot of them stay open for</p> <p>8 a -- quite a while.</p> <p>9 Q. Bear with me one second.</p> <p>10 Are there any other -- other than</p> <p>11 the folks who are part of the Summit County</p> <p>12 Drug Unit, are there any Summit County</p> <p>13 Sheriff's Office personnel who have a focus on</p> <p>14 narcotics-related activity?</p> <p>15 MR. LEDLIE: Object to the form.</p> <p>16 A. I mean, I think everybody has to</p> <p>17 have it in their mind. I don't know if -- are</p> <p>18 you asking specifically if that's their job</p> <p>19 duties?</p> <p>20 Q. Right, right. Or where it's a --</p> <p>21 and whether it -- not -- perhaps not their</p> <p>22 exclusive job --</p> <p>23 A. That's what I'm --</p> <p>24 Q. -- duty, but a significant portion</p> <p>25 of what they do.</p>

<p style="text-align: right;">Page 118</p> <p>1 A. I -- I imagine the patrolmen run 2 into narcotics quite frequently. 3 Q. Okay. 4 A. But exclusively, no, that's not 5 their -- their job duties. 6 Q. Okay. 7 MR. BLOCK: How are we doing on... 8 MR. LEDLIE: If we're around a 9 breaking point -- 10 MR. BLOCK: Yeah, why don't we. I 11 think we're at a logical -- 12 MR. LEDLIE: Yeah. 13 MR. BLOCK: -- break point. Good. 14 MR. LEDLIE: Okay. 15 THE VIDEOGRAPHER: Off the record 16 at 11:02 a.m. 17 (A recess was taken.) 18 THE VIDEOGRAPHER: Back on the 19 record at 11:17 a.m. 20 BY MR. BLOCK: 21 Q. The DEA, I think you said RAC, 22 regional -- resident agent -- 23 A. In charge. 24 Q. -- in charge, is that Mr. Kokinski? 25 A. Kochanowski.</p>	<p style="text-align: right;">Page 120</p> <p>1 agents, or anywhere from four to six? 2 A. Yeah. 3 Q. All right. Is that right? 4 A. Yeah. 5 Q. Okay. 6 A. That's pretty -- pretty close. 7 Q. And has that been the case sort of 8 the -- has that been the size of the DEA -- 9 A. No. They've -- they've added a few 10 over the years. 11 Q. Okay. So there were -- do you 12 remember how many there were in 2012? 13 A. We had two. Two, and they've since 14 added four. 15 Q. The -- the HIDTA funding that you 16 get -- 17 A. Uh-huh. Yeah. 18 Q. -- do you have to -- you have to 19 submit any reports or anything to HIDTA to 20 show -- to apply for funding for the -- for 21 the -- you know, the next year and the year 22 after that? 23 A. Like a proposal? 24 Q. Sure. 25 A. No.</p>
<p style="text-align: right;">Page 119</p> <p>1 Q. Kochanowski. 2 A. See, you know, don't -- 3 Q. Yeah. That -- 4 A. -- let me confuse their titles 5 there. I -- I know I have special agents and 6 they have RACs. Whether it's him or Keith, I 7 think Eric reports to Keith Martin. 8 Q. Okay. Do either Eric or Keith have 9 any input into what investigations the drug 10 unit works on? 11 A. Its direction? You're saying in 12 direction -- 13 Q. Sure. 14 A. -- or input in cases in general? 15 If it's a -- a federal case, sure, they'd have 16 in- -- input. 17 Q. Okay. How about in terms of 18 direction? Do they get to at least offer their 19 opinion? Like, here -- here's -- 20 A. Oh, sure. 21 Q. How do they do that? To whom do 22 they -- 23 A. He would talk to a special agent if 24 he wanted to give him direction on a case or -- 25 Q. And there are four of those special</p>	<p style="text-align: right;">Page 121</p> <p>1 Q. Does HIDTA have any input into what 2 the funds are used on -- for? 3 A. I know some things they prefer the 4 funds be used for. 5 Q. What are those things? 6 A. They're not -- they expressed to me 7 one time that they would like more money to go 8 towards overtime and not spend it on cars, 9 like, as an example. 10 Q. How about in terms of types of drug 11 activity, that -- any -- have they ever 12 expressed to you to focus more on X type of 13 drug and less on Y? 14 A. I don't know if they're that 15 intimately familiar with our -- our -- our 16 areas to be able to direct us like that. 17 Q. Who -- and when you said they 18 expressed to you, who were you referring to? 19 A. There's actually a HIDTA board at 20 HIDTA, so we had to go to budget review 21 meetings. I've been to maybe two of them. 22 Q. Where were those meetings? 23 A. They're at HIDTA, in Cleveland. 24 Q. Okay. When was the most recent one 25 of those meetings?</p>



<p style="text-align: right;">Page 122</p> <p>1 A. That's -- it's been a few years.  2 Now they -- they come and do an audit at the  3 office. Derek Siegel will come down to the  4 office and do an audit.  5 Q. And when you say "does an audit,"  6 what does that entail?  7 A. If they have a piece of equipment  8 at the office, they want to make sure it's  9 still there. They give you a kind of a -- like  10 a report card on your stats. They kind of  11 break them down by task force throughout the  12 HIDTA regions.  13 Q. What stats are you referring to?  14 MR. LEDLIE: Object to the form of  15 the question.  16 A. Our quarterly stats we submit to  17 HIDTA.  18 Q. Okay. When you say you get a  19 report card, I mean, like, you get a letter  20 grade?  21 A. No.  22 Q. Okay. What -- what did you mean?  23 A. They -- they just give you, like,  24 a -- they're not trying to get task forces to  25 compete, but they just show you where you fall</p>	<p style="text-align: right;">Page 124</p> <p>1 detective to run that investigation and then  2 call upon the drug unit for -- to follow up on  3 that, maybe with the -- with the drug dealer,  4 an investigation.  5 Q. When you say "call upon their  6 detective," they may call the Cuyahoga Police  7 Department detective who's assigned to the drug  8 unit and say, "You need to go to the scene" --  9 A. Sure.  10 Q. -- "and see what happened"?  11 A. Yeah.  12 Q. Okay. And that's -- do you have --  13 as the drug unit commander, do you have any  14 issues with that?  15 A. No. They're -- they're still  16 paying his salary and he still works for them.  17 Q. How about is there anyone within  18 the Summit County Sheriff's Office that has any  19 responsibilities in terms of responding to  20 overdoses?  21 A. Yes.  22 Q. Who is that?  23 A. Well, it's -- it starts with a  24 patrolman. They -- they'd probably be the  25 first responder to an -- to an overdose. Then</p>
<p style="text-align: right;">Page 123</p> <p>1 in seizures, like drug seizures and -- and  2 things like that.  3 Q. Okay. Is that a written document?  4 A. That is.  5 Q. Okay. And is that sent to you?  6 A. Yes.  7 Q. Okay. To your --  8 A. E-mail.  9 Q. To e-mail? All right.  10 Does the -- does the drug unit --  11 we talked about the investigations that the  12 drug unit handles. Does the -- the drug unit  13 have any involvement in responding to --  14 responding to overdoses?  15 A. The drug unit? No.  16 Q. Okay. Has the drug unit ever had  17 any responsibility related to overdoses?  18 A. To clarify that, there are guys,  19 detectives assigned to the unit that their home  20 agencies will have them respond to overdoses in  21 their home districts, not affiliated with the  22 drug unit. Do you understand what I'm saying?  23 Q. Could you give an example?  24 A. Sure. Like, say, Cuyahoga Falls  25 has a drug overdose. They may call upon their</p>	<p style="text-align: right;">Page 125</p> <p>1 the squad, the fire department. There's two  2 detectives in the sheriff's office detective  3 bureau that will respond to overdoses. And  4 then, at one point, we had two patrolmen go  5 with these two detectives, to overdoses.  6 Q. Okay. Any- -- anybody else?  7 A. No, that I can think of.  8 Q. Can we -- let's unpack that just a  9 little bit.  10 A. Yeah, sure.  11 Q. First of all, do you know when that  12 started, having detectives respond to overdose  13 scenes? Is that the right way to say it?  14 A. Yeah, I -- you know, if there's a  15 death involved, they've always responded to  16 any -- any manner of death.  17 Q. Right.  18 A. So I -- I can't, you know, break  19 that down for you. But probably in the last --  20 probably in the last few years, they started  21 responding to overdoses that -- those that the  22 people lived.  23 Q. Okay. Who are the two detectives?  24 A. Larry Brown and Jason Kline.  25 Q. Have those -- have those always</p>



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1 been the -- have there been other detectives  
 2 who were the overdose response people before  
 3 Detectives Brown and Klein?  
 4 MR. LEDLIE: Object to the form.  
 5 A. I don't know. I mean, if -- before  
 6 my time, if you're asking these questions, I  
 7 don't know. I don't know. The detective  
 8 bureau is ran by Scott Cottle. He decides who  
 9 goes out on what cases. I --  
 10 Q. And do -- is there any coordination  
 11 between either those two detectives or  
 12 Lieutenant Cottle -- any coordination between  
 13 what those detectives are doing and what the  
 14 drug unit is doing?  
 15 A. Sometimes.  
 16 Q. Okay. In what circumstances?  
 17 A. If they go out on an overdose and  
 18 there's enough evidence to potentially pursue  
 19 the person that sold them the drugs, we'll  
 20 assist with that, because we're better at drug  
 21 deals than those guys.  
 22 Q. How -- do you know -- have a sense  
 23 for how often that occurs?  
 24 A. I can only think of a couple  
 25 occasions that -- those are really hard

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1 investigations.  
 2 Q. Hard investigations?  
 3 A. Yeah, to pursue.  
 4 Q. In what sense?  
 5 A. I mean, the person's dead or -- you  
 6 know, if the person is dead, then, you know,  
 7 you would have to try and gather the evidence  
 8 on scene and --  
 9 Q. I see.  
 10 A. -- go backwards.  
 11 Q. The instances that you can think  
 12 of, can you remember what type of drug was  
 13 involved?  
 14 A. I don't remember if it was heroin  
 15 or fentanyl.  
 16 Q. It was one or the other?  
 17 A. Yes.  
 18 Q. Okay. And -- and did it result in  
 19 a -- a successful investigation, I guess I  
 20 should say?  
 21 A. Yes.  
 22 Q. And -- and how so?  
 23 A. I believe -- we don't follow  
 24 through with the investigation once the  
 25 detec- -- once we assist the detective bureau.

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1 Jason Kline would be a better person to ans- --  
 2 to answer these questions. But I believe he  
 3 successfully prosecuted maybe four to six  
 4 people in the -- in the deaths of others  
 5 relating to heroin and fentanyl.  
 6 Q. The people that he prosecuted would  
 7 have been the people who sold the heroin or  
 8 fentanyl to the people that died?  
 9 A. Yes.  
 10 Q. Okay. Have you ever been able to  
 11 go from there and make an arrest, you know, one  
 12 level up, to the distributor or the supplier of  
 13 the fentanyl to the person who sold it?  
 14 A. You would have to ask him those --  
 15 those questions.  
 16 Q. Okay.  
 17 A. Do you know what I'm saying? I'm  
 18 trying to answer your question. I just --  
 19 Q. Yeah. You can only do the best you  
 20 can.  
 21 A. Yeah, I'm trying, you know.  
 22 Q. All right.  
 23 Do you know, for an -- for an  
 24 overdose response where the person has -- has  
 25 lived, so then there might be, you know,

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1 someone you can interview to find out --  
 2 A. Yeah.  
 3 Q. -- more details, does the -- is  
 4 there a set -- is there a checklist or anything  
 5 in terms of the types of questions that  
 6 detectives are supposed to ask that person  
 7 related to where they got the drugs from?  
 8 A. I -- I don't know what their --  
 9 Q. Okay.  
 10 A. -- Cottle's -- Lieutenant Cottle  
 11 instructs them to ask, but they're pretty  
 12 seasoned detectives, and I think they would  
 13 know what to ask.  
 14 Q. Okay.  
 15 A. But whether there's a formal  
 16 checklist, I -- I don't know.  
 17 Q. All right. Let's -- let's look  
 18 at -- I'm sorry. Let's do this this way.  
 19 MR. BLOCK: I'm going to hand you  
 20 what's been marked as Paolino Exhibit 1.  
 21 - - - - -  
 22 (Thereupon, Deposition Exhibit 1,  
 23 Summit County Sheriff's Office 2017  
 24 Annual Report, SUMMIT\_000830451 to  
 25 000830510, was marked for purposes

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1 of identification.)  
2 - - - - -  
3 MR. BLOCK: And while you're -- I'm  
4 going to describe for the record while you're  
5 taking a look at this, but Paolino Exhibit 1 is  
6 a document entitled "Summit County Sheriff's  
7 Office 2017 Annual Report," bears the Bates  
8 label SUMMIT 830451 through 830510.  
9 And by "Bates label," I'm referring  
10 to the little numbers printed --  
11 THE WITNESS: Okay.  
12 MR. BLOCK: -- stamped at the  
13 bottom of the page.  
14 THE WITNESS: Okay. Sure.  
15 Q. Are -- are you familiar with the  
16 sheriff- -- Summit County Sheriff's Office  
17 annual reports?  
18 A. I'm familiar with it.  
19 Q. Do you have any involvement in the  
20 submission of any of the content for this  
21 report?  
22 A. Yeah. Yes.  
23 Q. Which -- which part or parts?  
24 A. By looking at the table of  
25 contents, I imagine it would be page 34 to 36.

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1 Q. 34 to 36 for the drug unit?  
2 A. Yeah.  
3 Q. Okay.  
4 A. I'll have to look at those to --  
5 Q. Yeah, let's --  
6 A. Uh-huh.  
7 Q. Is that -- do you recognize the --  
8 A. Yes.  
9 Q. -- content of pages 34 to 36?  
10 A. Uh-huh.  
11 Q. You do?  
12 A. Yes.  
13 Q. I'm sorry. I need a yes or no.  
14 A. I'm sorry. Yes, yes.  
15 Q. Okay. And does this -- did this  
16 come from you?  
17 A. This came from -- we would have --  
18 I would have had Carmen compile our statistics,  
19 put them in a reasonable format someone could  
20 understand, and send them to -- I believe the  
21 guy's name is Paul Matulavich that compiles  
22 this entire booklet.  
23 Q. Matulavich?  
24 A. Yes.  
25 Q. Okay. All right. And when you say

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1 "compile the statistics," what source or  
2 sources are the statistics being compiled from?  
3 A. She would use our quarterly HIDTA  
4 stats, and she could also use our EPIC stats.  
5 Q. What is EP- --  
6 A. El Paso Intelligence Center. We --  
7 we submit daily drug seizures, search warrants  
8 in a way to track our activities. So she could  
9 pull that information from that website to  
10 compile these.  
11 Q. El Paso, is that El Paso, Texas?  
12 A. Uh-huh.  
13 Q. Okay. Is that a --  
14 A. That's a DEA --  
15 Q. Got you.  
16 So when you were referring to  
17 the -- the stats that are depicted here in the  
18 annual report on pages 34 to 36, is that the --  
19 basically the tables with the numbers? For  
20 example, the -- on page 34, there's a table for  
21 "K9 Drug Interdiction Removals in 2017." Do  
22 you see that?  
23 A. I do.  
24 Q. All right. Is that -- is that some  
25 of the stats that you're referring to?

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1 A. Yes. These would be K9 stats.  
2 Q. Okay. And then on page 35, in the  
3 upper right-hand corner, there is a table of  
4 "Deaths Per Year," and then it lists "Due To  
5 Heroin and Fentanyl." Do you see that?  
6 A. I see the deaths per -- I do, yes.  
7 Q. Okay. Do you know what the source  
8 of that is?  
9 A. That would come from the medical  
10 examiner's office.  
11 Q. Okay. And how -- how, if at all,  
12 does the drug unit interact with the medical  
13 examiner's office?  
14 A. How often?  
15 Q. How, if at all? How do you --  
16 A. I think it was in 2015 when the  
17 Office of Criminal Justice Services, the place  
18 that's like the clearinghouse for our grants,  
19 requested death stats -- death stats. And I --  
20 that's -- and we would call the medical  
21 examiner's office and ask for our stats, so  
22 that -- that's our interaction with them.  
23 Q. Now, this report only lists heroin  
24 and fentanyl deaths. Why is that?  
25 A. That's a better question for a

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1 medical examiner, but I can answer it the best  
2 I can.  
3 Q. Please.  
4 A. If this person had heroin and, say,  
5 alcohol in their system, or heroin and any  
6 other drug, Xanax or anything like that, they  
7 couldn't list it as a heroin death. So it  
8 would have to be just fentanyl or heroin to be  
9 listed in these numbers.  
10 If they can't determine the -- if  
11 there's multiple drugs, they can't, obviously,  
12 say that it was a fentanyl death.  
13 Q. And related question, do you know  
14 why were you putting, in the annual report for  
15 the sheriff's office, why were you highlighting  
16 the heroin and fentanyl deaths as opposed to  
17 other drug-related deaths?  
18 A. Why were we putting in heroin and  
19 fentanyl? Because that was the -- a main focus  
20 in the county at that time is people were dying  
21 from heroin and fentanyl increasing -- in  
22 increasing numbers. In '16, it was a -- it  
23 took a big spike. Deaths spiked in '16, so it  
24 got the attention of everyone in the state, I  
25 believe.

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1 Q. The -- do you know when does the --  
2 do you know when the report comes out, this  
3 annual report?  
4 A. I just got an e-mail on that.  
5 Generally, I think, February, March.  
6 Q. You go on a calendar year?  
7 A. Yeah.  
8 Q. Call right. Okay. So I take it,  
9 then, there hasn't been a 2018 annual report  
10 yet?  
11 A. No, no. That's coming.  
12 Q. Do you know whether the heroin and  
13 fentanyl death number is up or down for 2018  
14 from where it was in 2017?  
15 A. Compared to this, no. No. I don't  
16 know if it's up or down from 145, exactly.  
17 Q. Okay. All right. You also --  
18 there's a paragraph -- several paragraphs on  
19 page 35 related to methamphetamine.  
20 A. Uh-huh.  
21 Q. Just why -- why did you have a  
22 separate section on methamphetamines?  
23 A. Well, I think -- let me -- let me  
24 look at this real quick.  
25 Q. Please.

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1 A. I believe I listed methamphetamine  
2 annually because it's been, in one way or  
3 another, a focus of our investigations.  
4 This year, I'm seeing that -- this  
5 year we seized 100 pounds of crystal meth, so  
6 it seemed pretty important to put in there.  
7 Q. And when you said "this year,"  
8 you're referring, in your answer, to the 2017  
9 report, just for clarity?  
10 A. I'm sorry, yes, 2017.  
11 Q. No, you're fine. You're fine. I'm  
12 just clarifying for the record.  
13 Okay. And then, if we go to page  
14 36, which has some other statistics. First, on  
15 the upper left corner, there's a table entitled  
16 "Pharmaceuticals Destroyed Via D.U.M.P."  
17 A. Yes.  
18 Q. What is -- what is D.U.M.P.?  
19 A. D.U.M.P. is Dispose of Unused  
20 Medications Program. It's where -- do you want  
21 me to go in detail?  
22 Q. Please, if you could describe it.  
23 A. It's where people in the community  
24 can come to the local police department and get  
25 rid of their old used or unwanted medications.

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1 DEA sponsors a couple days a year,  
2 and we've done our own drug collection days a  
3 few times, a couple times a year. We've done  
4 one just recently, and we'll do another one in  
5 spring.  
6 Q. Is that something that the sher- --  
7 the Summit County Drug Unit runs, that program?  
8 A. Oh, the -- the big one, the DEA  
9 runs it. Like, the -- they pay for the boxes  
10 and pay for the disposal. But we do drug  
11 collection every day, basically. But we have  
12 certain days that we'll actually stop in, set  
13 up a little booth, and -- and take the drugs  
14 that people drop off.  
15 Q. And when you say "we," who -- who  
16 do you mean?  
17 A. I'm sorry. The sheriff's office.  
18 Q. And is it someone in the drug unit  
19 or someone --  
20 A. Yeah.  
21 Q. Who?  
22 A. Last time it was Sergeant  
23 Angerstein and Bob Scalise.  
24 Q. Do you know the -- the pounds, the  
25 numbers here, is that referring to medications

<p style="text-align: right;">Page 138</p> <p>1 that were collected by DEA?</p> <p>2 A. This is medications that were</p> <p>3 collected by the Summit County Drug Unit.</p> <p>4 Q. Okay. And then there would be more</p> <p>5 that were --</p> <p>6 A. Sure.</p> <p>7 Q. -- collected by DEA?</p> <p>8 A. Yeah.</p> <p>9 Q. Okay. The stuff that the Summit</p> <p>10 County Drug Unit collects, where does it go?</p> <p>11 A. This would be -- let me clarify.</p> <p>12 Q. Okay. Please.</p> <p>13 A. This would be -- these pounds would</p> <p>14 probably be -- if we had a DEA collection day</p> <p>15 and we had our own collection day, this would</p> <p>16 be a combination of those --</p> <p>17 Q. Okay.</p> <p>18 A. -- weights, just so we're clear.</p> <p>19 Q. Okay. Who -- who -- if I may, who</p> <p>20 tracks this? Who counts it, or who weighs it,</p> <p>21 who keeps track?</p> <p>22 A. These -- the -- Pat Leonard from</p> <p>23 the Akron Police Department, assigned to TDS,</p> <p>24 he weighed these boxes and takes a tally on the</p> <p>25 boxes.</p>	<p style="text-align: right;">Page 140</p> <p>1 A. -- and Stacey Milkey will load them</p> <p>2 in a van and drive them to -- I think they go</p> <p>3 to Ross County, have them burned.</p> <p>4 Q. Then under -- underneath</p> <p>5 "Pharmaceuticals Destroyed via D.U.M.P.,"</p> <p>6 there's "Drug Unit Operational Highlights," and</p> <p>7 it -- the first sentence says, "During 2017 the</p> <p>8 Summit County Drug Unit made 114 arrests of</p> <p>9 persons for drug-related offenses and executed</p> <p>10 154 searches."</p> <p>11 Do you see that?</p> <p>12 A. I do.</p> <p>13 Q. Where do those statistics come</p> <p>14 from?</p> <p>15 A. They would have come from either --</p> <p>16 she would have collected them from the</p> <p>17 quarterly HIDTA stats or the EPIC website.</p> <p>18 Q. Okay.</p> <p>19 A. The stats should correlate --</p> <p>20 Q. Sure.</p> <p>21 A. -- with what's in EPIC and what's</p> <p>22 in HIDTA.</p> <p>23 Q. Okay. Then in terms of the -- the</p> <p>24 criminal assets seized, I'm -- I'm now in the</p> <p>25 upper right-hand column on page 36.</p>
<p style="text-align: right;">Page 139</p> <p>1 Q. And then where -- what do they do</p> <p>2 with this stuff?</p> <p>3 A. They take them to an in- -- a</p> <p>4 furnace, and they burn them.</p> <p>5 Q. Okay. And the costs associated</p> <p>6 with that are covered basically by DEA; is that</p> <p>7 right?</p> <p>8 MR. LEDLIE: Object to the form of</p> <p>9 the question.</p> <p>10 You can answer it.</p> <p>11 A. I believe so. I believe --</p> <p>12 Q. Okay.</p> <p>13 A. -- DEA covers that. And then the</p> <p>14 collection boxes around the -- the county, the</p> <p>15 Addiction -- the ADM Board pays for that.</p> <p>16 Q. And those -- that board or those</p> <p>17 boxes will get turned over to the -- to</p> <p>18 Detective Leonard to be added to the mix to get</p> <p>19 weighed and burned?</p> <p>20 A. You know, it depends what time of</p> <p>21 year it is.</p> <p>22 Q. Okay.</p> <p>23 A. If there's not a collection with</p> <p>24 the DEA coming up, Carmen Ingram --</p> <p>25 Q. Yes.</p>	<p style="text-align: right;">Page 141</p> <p>1 A. Okay.</p> <p>2 Q. What is the -- what is covered</p> <p>3 under "Criminal Assets Seized"?</p> <p>4 A. Are you asking me to read the</p> <p>5 categories here?</p> <p>6 Q. I was hoping you could</p> <p>7 just describe more generally what that means.</p> <p>8 I see that -- that, for example, it says,</p> <p>9 "Vehicles, \$157,000." What does that</p> <p>10 represent?</p> <p>11 A. That would represent a value of the</p> <p>12 total number of vehicles seized.</p> <p>13 Q. Okay. What's the difference</p> <p>14 between a criminal asset seized and a criminal</p> <p>15 forfeiture, which is the next -- or the table</p> <p>16 right underneath it?</p> <p>17 A. See how there's a 157,761 value</p> <p>18 vehicle seized?</p> <p>19 Q. Yes.</p> <p>20 A. The forfeiture may be a vehicle</p> <p>21 could have been given back, or they could have</p> <p>22 brought less money at an auction, or this is</p> <p>23 and estimate, and this is actual --</p> <p>24 Q. Okay.</p> <p>25 A. -- would be the best way to</p>

<p style="text-align: right;">Page 142</p> <p>1 describe it.</p> <p>2 Q. Okay. And when it say- -- for the</p> <p>3 actual, for the -- the forfeitures is the</p> <p>4 actual?</p> <p>5 A. Yeah.</p> <p>6 Q. Does that money come back to the</p> <p>7 drug unit?</p> <p>8 A. It all depends what -- what kind of</p> <p>9 case it was.</p> <p>10 Q. Okay.</p> <p>11 A. It all depends if -- how many</p> <p>12 agencies were involved.</p> <p>13 Q. All right.</p> <p>14 A. We don't keep all the money, if</p> <p>15 that's what you're asking.</p> <p>16 Q. But you keep at least some of the</p> <p>17 money?</p> <p>18 A. Oh, sure. Yeah.</p> <p>19 Q. Then there's the -- the table below</p> <p>20 that says, "Drug" -- "2017 Drug Removal from</p> <p>21 Streets," and it has both an amount and a</p> <p>22 street value. Where does that information come</p> <p>23 from?</p> <p>24 A. It would come, again, from our --</p> <p>25 our stats, annual stats collected.</p>	<p style="text-align: right;">Page 144</p> <p>1 accurate.</p> <p>2 Q. All right. Can I ask you if --</p> <p>3 sorry.</p> <p>4 On -- back on page 34, under the</p> <p>5 "High Intensity Drug Trafficking Areas," it</p> <p>6 talks a little bit about HIDTA, and the last</p> <p>7 sentence says, "HIDTA supplies the Summit</p> <p>8 Drug" -- "Summit County Drug Unit with one</p> <p>9 full-time analyst."</p> <p>10 A. Yeah.</p> <p>11 Q. Who is that?</p> <p>12 A. That is -- that's another one of</p> <p>13 those National Guard through HIDTA to us. It's</p> <p>14 Courtney Campbell.</p> <p>15 Q. Okay. Got it. Thank you.</p> <p>16 And I just -- stepping back, two</p> <p>17 other things I wanted to cover in --</p> <p>18 MR. BLOCK: Whoops. Sorry. You</p> <p>19 all right?</p> <p>20 Q. -- on this annual report. If you</p> <p>21 look at page -- the Bates number is 830457. So</p> <p>22 it's going closer to the front.</p> <p>23 A. Closer to the front?</p> <p>24 Q. Yeah. Sorry. I don't see a</p> <p>25 page -- a normal page number, but the little</p>
<p style="text-align: right;">Page 143</p> <p>1 Q. Okay. How do you -- how is street</p> <p>2 value determined?</p> <p>3 A. We -- like what we pay for -- we'll</p> <p>4 either get the numbers from what we're paying</p> <p>5 for a gram of cocaine or -- or fentanyl. We</p> <p>6 pull them off --</p> <p>7 Q. When you say you're paying for it,</p> <p>8 like in a --</p> <p>9 A. In a controlled -- controlled buy.</p> <p>10 Q. Yes. I understand.</p> <p>11 A. A controlled buy. So -- so that's</p> <p>12 clear.</p> <p>13 Q. Okay. Probably good to make that</p> <p>14 clear.</p> <p>15 A. Yeah, yeah, let's make that clear.</p> <p>16 Q. All right. And so to the best of</p> <p>17 your knowledge, these are acc- -- these</p> <p>18 statistics are accurate?</p> <p>19 A. I mean, to the best of my</p> <p>20 knowledge.</p> <p>21 Q. All right. They were certainly --</p> <p>22 you intended for them to be accurate --</p> <p>23 A. Of course.</p> <p>24 Q. -- in this report.</p> <p>25 A. Yes, we intend for them to be</p>	<p style="text-align: right;">Page 145</p> <p>1 tiny print on the bottom right is 830457. It's</p> <p>2 an org chart.</p> <p>3 MR. LEDLIE: I think it's even --</p> <p>4 it's, like, very near the front now.</p> <p>5 THE WITNESS: Oh, very near.</p> <p>6 MR. LEDLIE: There you go.</p> <p>7 THE WITNESS: Oh, look at that.</p> <p>8 MR. BLOCK: Okay.</p> <p>9 THE WITNESS: You found a</p> <p>10 flowchart.</p> <p>11 MR. BLOCK: I -- well, I found one.</p> <p>12 Q. Have you seen this before?</p> <p>13 A. I may have.</p> <p>14 Q. Okay.</p> <p>15 A. I may not have paid much attention</p> <p>16 to it.</p> <p>17 Q. All right. Well, let's look at</p> <p>18 least under -- at the portion of it under</p> <p>19 "Investigations." Do you see there's -- breaks</p> <p>20 down to drug unit and detective bureau?</p> <p>21 A. Yeah.</p> <p>22 Q. All right. And under "Drug Unit,"</p> <p>23 it says "Supervisor, Captain Matt Paolino."</p> <p>24 That's you; is that right?</p> <p>25 A. I am.</p>



<p style="text-align: right;">Page 146</p> <p>1 Q. Okay. And is that accurate that 2 you're the supervisor of the drug unit? 3 A. Yes. 4 Q. All right. And then it says 5 "Secretary (1)." Who would that be? 6 A. That's Stacey Milkey. 7 Q. Okay. "Drug" -- and then 8 underneath it says "Drug Unit Sergeant (1)." 9 Who is that? 10 A. Jerome Angerstein. Jerry 11 Angerstein. 12 Q. Okay. And then "Detectives (4)"? 13 A. Yes. 14 Q. Who would those be again? Just... 15 A. Carmen Ingram, Bob Scalise, Ryan 16 Knight, Jimmy Fields. 17 Q. Okay. And so Ms. Baker- -- 18 A. Lori Baker-Stella? 19 Q. -- Baker-Stella, do you know 20 where -- 21 A. I -- I didn't make the flowchart. 22 You're asking why it's not a five right there? 23 Q. No. I -- I don't know. Would she 24 fall under anybody else's -- do you know 25 whether she would go under any of the other</p>	<p style="text-align: right;">Page 148</p> <p>1 Q. -- signed by Sheriff Barry. I 2 wanted to direct your attention to the -- one, 3 two, three -- the fourth paragraph. 4 A. Okay. 5 Q. Can -- 6 A. Sure. 7 Q. -- you read that quickly and let me 8 know when you're done. 9 A. Okay. 10 Q. There's a reference, in the second 11 sentence to commending the patrol and detective 12 bureaus, along with the drug unit, for their 13 proactive approaches in dealing with these 14 illicit activities, as well as their 15 investigative skills. 16 Do -- do you -- do you know what -- 17 maybe you've covered this already, but in terms 18 of the patrol unit -- patrol bureau, I guess, 19 combatting the opioid crisis and dealing with 20 illicit activities, would that be in connection 21 with just walking the beat and observing 22 activity that ends up -- illegal activity that 23 ends up being related to narcotics? 24 A. I guess that could be. I mean, I 25 don't -- if you're asking me what was in his</p>
<p style="text-align: right;">Page 147</p> <p>1 boxes on this thing? 2 A. I guess she should be -- that 3 should be a five, because she's technically 4 assigned through us. 5 Q. Okay. 6 A. But I -- I don't know. 7 Q. Okay. 8 A. I don't really see anything. 9 Q. All right. Do you know who creates 10 this flowchart? 11 A. It was probably Paul -- Paul 12 Matulavich. 13 Q. Okay. Is his name on here? 14 MR. LEDLIE: I think it's on the 15 top. 16 Q. Is it -- top right -- 17 MR. BLOCK: Thank you. 18 Q. -- director of public relations? 19 MR. BLOCK: Thank you very much, 20 Counsel. 21 Q. Okay. And then one other thing I 22 wanted to ask you about. Just the very -- not 23 the very first page. The page that says 24 830454 -- 25 A. Okay.</p>	<p style="text-align: right;">Page 149</p> <p>1 head when he wrote this, I have no idea. I... 2 Q. I -- let me -- let me try to 3 rephrase the question. 4 A. Okay. 5 Q. I'm asking you, based on your 6 knowledge -- your personal knowledge of the 7 Summit County Sheriff's Office, what -- what 8 does the patrol bureau do related to the opioid 9 crisis? 10 A. I would say that he's -- I don't 11 want to say what he's thinking, but -- 12 Q. We can -- we can skip -- 13 A. Okay. They're -- 14 Q. You can put this aside. 15 A. They're proactive in -- in, you 16 know, traffic stops and -- and house checks 17 and -- and checking neighborhoods and 18 suspicious people. They're -- they're 19 proactive in those approaches. 20 Q. Okay. But in terms of what Sheriff 21 Barry was thinking when he wrote this, we'd 22 need to ask Sheriff Barry? 23 A. You'd have to ask Sheriff Barry. 24 Q. Okay. 25 A. I really don't know. I'm hoping he</p>

<p style="text-align: right;">Page 150</p> <p>1 was thinking they were proactive in their 2 approach. 3 Q. And in -- from your knowledge, in 4 terms of the detective bureau, what does -- 5 what does the detective bureau do in terms of 6 trying to be proactive in dealing with the 7 illicit activities associated with the opioid 8 crisis? 9 A. That's another department that's 10 completely housed off site. They do the same 11 things with -- they aggressively try to 12 investigate the heroin overdoses and drug -- 13 drug crimes. 14 Q. In terms of what Sheriff Barry had 15 in mind, we'd need to ask him? 16 A. Please. 17 Q. And -- okay. Is there a -- is 18 there someone -- is there a detective in the 19 drug unit who works with the State of Ohio 20 pharmaceutical board? 21 A. Besides Lori Baker-Stella? 22 Assigned through us? I don't know anybody that 23 works directly with the State Board of 24 Pharmacy. 25 Q. Does Detective Baker-Stella work</p>	<p style="text-align: right;">Page 152</p> <p>1 Q. How, if at all, does the drug unit 2 use that database? 3 A. If there's -- there has to be an 4 active pill case for them to get information 5 about someone's prescriptions. So there has to 6 be a case number, an active investigation for 7 them to get access to that kind of information. 8 Q. And then what -- what information 9 is in that database that can be helpful in such 10 an investigation? 11 A. If -- if the subject of the 12 investigation has a prescription for 13 medications. 14 Q. Anything else? 15 MR. LEDLIE: Object to the form. 16 A. They could potentially -- I -- I 17 don't know what you're asking. 18 Q. Are -- are there any active pill 19 cases now that the drug unit is working on? 20 A. Not that I'm aware of. 21 MR. BLOCK: Make this No. 2, 22 please. 23 - - - - - 24 (Thereupon, Deposition Exhibit 2, 25 Document Titled "Ohio Office of</p>
<p style="text-align: right;">Page 151</p> <p>1 directly with the State Board of Pharmacy? 2 A. I don't -- I don't know. When 3 you're saying directly -- 4 Q. Okay. 5 A. I'm sorry. 6 Q. Well, does -- does -- 7 A. I'm trying to follow you here. 8 Q. No, no. I'm -- I'm -- you're 9 helping me. I appreciate it. 10 A. Okay. Okay. 11 Q. Does -- does Detective Baker-Stella 12 have any involvement with the Ohio 13 pharmaceutical board, to your knowledge? 14 A. You'd have to ask her. I'm sure 15 she does, but you'd have to ask her. 16 Q. Okay. Does -- does the drug unit 17 have acc- -- have you heard of a -- the OARRS 18 database? 19 A. I have. 20 Q. Okay. Does the drug unit have 21 access to that? 22 A. We do. 23 Q. How long has that been the case? 24 A. I -- I believe since I've been 25 there we've had access to it.</p>	<p style="text-align: right;">Page 153</p> <p>1 Criminal Justice Services 2012 2 Semi-Annual Performance Report, 3 Summit_000108472 to 000108480, was 4 marked for purposes of 5 identification.) 6 - - - - - 7 Q. Captain Paolino, the court reporter 8 has marked, as Paolino Exhibit 2 a document 9 entitled "Ohio Office of Criminal Justice 10 Services 2012 Semiannual Performance Report." 11 It bears the Bates number -- it looks like -- 12 well, and it bears the Bates number SUMMIT 13 108472 through 108480. 14 Take -- if you need time to look 15 this over, my first question is going to be, do 16 you recognize this? 17 A. I can answer that one. Yes. 18 Q. Okay. And that will lead to my 19 next question. What -- what is this document? 20 A. This was the way that stats were 21 collected prior to EPIC. We no longer do this 22 report. This was just a -- for the JAG grant. 23 Q. What do you mean? What's the JAG 24 grant? 25 A. It's the federal grant, Edward</p>

<p style="text-align: right;">Page 154</p> <p>1 Byrne Justice Assistance Grant. This is the --  2 where the federal monies come from.  3 Q. What's the -- how much is that  4 grant for; do you know?  5 A. I think this year it was -- it's  6 dropped considerably. At this time, it may  7 have been \$150,000, but I think it's down to in  8 the 50-, \$60,000 range.  9 Q. What is that grant to be used for?  10 A. At the time this covered salary.  11 Q. Salary of?  12 A. Hylton Baker. Then it switched to  13 mine.  14 Q. Okay.  15 A. But now it doesn't cover the entire  16 salary anymore. It's dropped so low.  17 Q. Okay. But you -- there were -- you  18 described earlier there was another source of  19 funding for your salary?  20 A. Yeah. The state grant, Drug Law  21 Enforcement Fund, DLEF. That's a state-funded  22 grant.  23 Q. All right. Is -- does this  24 document, Exhibit 2, the -- is this the -- you  25 had -- you had referred earlier to the stats</p>	<p style="text-align: right;">Page 156</p> <p>1 Do you understand? So it's --  2 it's, like, collected in different -- they  3 collect it in different manners.  4 Q. Well, I -- fair enough. And what a  5 pain in the butt, but there have to -- there --  6 I'm just trying to get at the underlying --  7 there has to be underlying data from which you  8 can go and fill out the various reports in  9 whatever format the requester wants.  10 Where is that -- where is that  11 stored or who -- who keeps that at the drug  12 unit?  13 A. Are -- are you asking how we arrive  14 at these numbers?  15 Q. Sure. That's a better question.  16 A. Okay. They have -- in that EPIC  17 database --  18 Q. Yes.  19 A. -- they can submit the weight of  20 the drugs they seized or purchased, who was  21 arrested, the degree of felony. They can  22 submit all that data, and then it can be pulled  23 out and put into an answer -- to answer these  24 questions. And Carmen is really good at  25 pulling that information out.</p>
<p style="text-align: right;">Page 155</p> <p>1 that you kept. Is this a -- is this reflecting  2 those stats?  3 MR. LEDLIE: Object to the form.  4 A. I mean, it was a semiannual report.  5 It means we did it twice a year.  6 Q. Okay.  7 A. I guess if that's what you're  8 asking. These are statistics, yes.  9 Q. Well, you -- you referred to  10 your -- I think you referred to earlier as the  11 HIDTA stats that you -- that's how you keep  12 track of what the -- or that's where the unit  13 keeps track of its activities. Did I get that  14 right?  15 A. It's one of -- it's one of the  16 mechanisms for tracking stats.  17 Q. Okay.  18 A. See, HIDTA gives us money, so they  19 want statistics.  20 Q. Yes.  21 A. The federal government gives you  22 money, so they want statistics.  23 Q. Yes.  24 A. The state gives you money, so they  25 want statistics.</p>	<p style="text-align: right;">Page 157</p> <p>1 Q. When did the -- when did you  2 start -- when did the drug unit start using the  3 EPIC database?  4 A. That's been fairly new. Probably a  5 few years. A couple years, few years.  6 Q. What were you using before?  7 A. We used -- well, they used to  8 have -- used to write it on paper. And then we  9 started doing an action report, we call them.  10 We type them in the computer and submit into a  11 little database.  12 Q. Who's "they"?  13 A. I'm sorry. The detectives will  14 fill out an action re- -- the -- an action  15 report, and they can submit it to the database.  16 Q. Okay. What was the -- did that  17 database have a name?  18 A. It was -- we called them action  19 reports.  20 Q. Okay. Do they still do action  21 reports today?  22 A. Yes. I mean, with EPIC being --  23 capturing all the data, if they have trouble,  24 for some reason, getting their data entered in  25 EPIC, like if their drug doesn't exist in the</p>

<p style="text-align: right;">Page 158</p> <p>1 form, they'll still have to do an action 2 report. 3 Q. Did each detective -- the 4 detectives can enter their information directly 5 into EPIC? 6 A. Yes. 7 Q. Has that been the case ever since 8 you've had -- been using the EPIC system? 9 A. I hope. 10 Q. Okay. All right. And are you 11 still reporting -- you still have HIDTA 12 reporting obligations? 13 A. Yes. 14 Q. Okay. And do you use the EPIC 15 database for that or something different? 16 A. No. They send a -- like, an Excel 17 spreadsheet that you fill out, send it back to 18 Peg Leichter. 19 Q. Okay. And who -- who within the 20 drug unit is responsible? Like, actually fills 21 that out? 22 A. Oh, Carmen does that. 23 Q. Okay. Bear with me for a moment. 24 Are you familiar with something 25 called carfentanil?</p>	<p style="text-align: right;">Page 160</p> <p>1 pill press. 2 Q. Okay. What do you mean by that? 3 A. Someone purchased a pill press. 4 Q. Okay. 5 A. One of our guys found out about it, 6 and he fled -- the suspect fled the country. 7 So I don't know -- kind of didn't go anywhere. 8 Q. Got it. This was someone suspected 9 of drug activity -- 10 A. Yeah. 11 Q. -- who you knew had purchased a 12 pill press? 13 A. Yeah. 14 Q. So the concern was that he -- that 15 person could be trying to make counterfeit -- 16 A. Sure. 17 Q. -- pills? Okay. 18 Have you heard the term "blue 19 highway"? 20 A. I don't think I have. 21 Q. Okay. 22 A. Are you going to tell me what it is 23 or just leave me hanging? 24 Q. I think you've answered my 25 question.</p>
<p style="text-align: right;">Page 159</p> <p>1 A. Yes. 2 Q. What -- what is that? 3 A. I believe it's just a stronger form 4 of fentanyl. Some type of analogue, maybe. 5 Q. Has there -- have there been -- has 6 there been carfentanil-related activity in 7 Summit County? 8 A. There has. 9 Q. When -- when did that start? 10 A. I think it was, like, August of 11 2016 there was -- there was a spike in death -- 12 unintentional drug overdoses. 13 Q. Did you have -- do you have an 14 understanding of where the carfentanil was 15 coming from? 16 A. No. 17 Q. Are there active carfentanil 18 investigations today? 19 A. I imagine. 20 Q. And do you have -- strike that. 21 Okay. 22 Have there been issues in Summit 23 County with counterfeit prescription pills? 24 A. I can't think of a case in 25 particular, but we had a case of someone with a</p>	<p style="text-align: right;">Page 161</p> <p>1 How about have you -- have you 2 heard the -- of pill mills? 3 A. Sure. 4 Q. What do you -- 5 A. I've heard that term. 6 Q. What do you understand that term to 7 mean? 8 A. Just an office that will just crank 9 out prescriptions to whoever comes in. 10 Q. Are you aware of any pill mills 11 that have operated in Summit County? 12 A. I'm not. 13 Q. How about in -- any pill mills 14 operating near Summit County? 15 A. I don't know the specifics of it. 16 I did hear of one in Southern Ohio, I believe, 17 but I don't know details. Lori would be better 18 to ask those questions. 19 Q. And that -- my next question was do 20 you know whether -- does the drug unit do any 21 investigation into potential pill mills? 22 MR. LEDLIE: Object to the form of 23 the question. Asked and answered. 24 A. We would. But chances are we would 25 give that complaint to a unit better equipped</p>

<p style="text-align: right;">Page 162</p> <p>1 to handle those types of investigations.</p> <p>2 Q. And would that be the unit that</p> <p>3 Ms. Baker -- Deputy Baker-Stella works with?</p> <p>4 A. Yeah.</p> <p>5 Q. Okay. Why -- you say "better</p> <p>6 equipped." Why -- why or how so?</p> <p>7 A. My understanding is these are</p> <p>8 really long, drawn-out investigations, and --</p> <p>9 and they're -- they have the training for them.</p> <p>10 I think they would be better equipped to handle</p> <p>11 a doctor or pill mill or something like that.</p> <p>12 Q. Okay. We talked about the</p> <p>13 personnel assigned to the drug unit, talked</p> <p>14 about the -- without revealing its location,</p> <p>15 the building where the drug unit is housed.</p> <p>16 You mentioned the fleet. There -- did you say</p> <p>17 there are about 30 cars? Are they --</p> <p>18 A. I mean --</p> <p>19 Q. Is it all cars or --</p> <p>20 A. I mean, we have some different</p> <p>21 types of vehicles.</p> <p>22 Q. Okay. Are some of those used for</p> <p>23 undercover work?</p> <p>24 A. They all are.</p> <p>25 Q. Okay. Got it. They're all for</p>	<p style="text-align: right;">Page 164</p> <p>1 MR. BLOCK: All right. Well, we</p> <p>2 can do that at the -- at a convenient break.</p> <p>3 Let's keep going, although I lost</p> <p>4 my train of thought with the next question.</p> <p>5 THE WITNESS: I might be able to</p> <p>6 answer and please both of you.</p> <p>7 MR. LEDLIE: Okay. Go ahead if you</p> <p>8 can.</p> <p>9 A. I mean, we're available to respond</p> <p>10 24 hours a day. I mean, that's the best way to</p> <p>11 say. We're all on call. We all know that we</p> <p>12 all could be called out at any time. We're</p> <p>13 available all day, all night.</p> <p>14 Q. Do the -- is there, like, a duty --</p> <p>15 someone's, like the duty officer if there's an</p> <p>16 after-hours call?</p> <p>17 A. No, it's not like that.</p> <p>18 Q. Okay. When you took over -- when</p> <p>19 you became the commander of the drug unit, and</p> <p>20 you said there was some overlap with -- was it</p> <p>21 Captain Baker?</p> <p>22 A. Yes.</p> <p>23 Q. All right -- did he -- was there</p> <p>24 a -- was there a briefing book, any sort of</p> <p>25 written material that he gave you in terms of</p>
<p style="text-align: right;">Page 163</p> <p>1 undercover work.</p> <p>2 A. Yes.</p> <p>3 Q. All right. Oh, the drug unit, is</p> <p>4 it -- is the drug unit staffed 24 hours a day?</p> <p>5 A. No.</p> <p>6 Q. What are the --</p> <p>7 MR. LEDLIE: Object to the form of</p> <p>8 the question.</p> <p>9 Q. What are the operational hours that</p> <p>10 folks are working at the drug unit?</p> <p>11 MR. LEDLIE: I'm going to instruct</p> <p>12 him not to answer because that could endanger</p> <p>13 the safety of the officers. I'm going to --</p> <p>14 I'm going to instruct him not to answer on</p> <p>15 that.</p> <p>16 MR. BLOCK: I don't -- I'm</p> <p>17 certainly not trying to endanger anybody's</p> <p>18 safety, but that's not a valid basis to</p> <p>19 instruct a witness not to answer.</p> <p>20 MR. LEDLIE: We can go talk to the</p> <p>21 judge if you want to get into when he has</p> <p>22 officers capable of responding to drug issues.</p> <p>23 That is not really a part of this litigation.</p> <p>24 So if you want -- if you want to take this up,</p> <p>25 let's -- let's take it up.</p>	<p style="text-align: right;">Page 165</p> <p>1 understanding what the drug unit did and how it</p> <p>2 operated?</p> <p>3 A. I think the only written material I</p> <p>4 had was maybe a policy and procedure book.</p> <p>5 You know, he assisted with grant</p> <p>6 the first year because I had no idea how to</p> <p>7 fill that out. It probably was this one you're</p> <p>8 showing me here, the stats from that.</p> <p>9 Q. Okay. The policy and procedure</p> <p>10 book, is there a policy and procedure book for</p> <p>11 the drug unit today?</p> <p>12 A. There is, but it's -- it's specific</p> <p>13 sheriff's policies, like pursuit, and, like, a</p> <p>14 guy is not allowed to pursue somebody in an</p> <p>15 unmarked car. It's just basic policies like</p> <p>16 that.</p> <p>17 Q. Okay. Is there any portion of the</p> <p>18 policy and procedure book that's specific to</p> <p>19 how to do narcotics investigations?</p> <p>20 A. There's a section on confidential</p> <p>21 informants.</p> <p>22 Q. In terms of rules for how to --</p> <p>23 A. Yeah.</p> <p>24 Q. -- get one and get it approved,</p> <p>25 et cetera? Okay. Anything else?</p>



<p style="text-align: right;">Page 166</p> <p>1 A. I can't think of, off the top of my 2 head. 3 Q. All right. Does the -- does the -- 4 Summit County's geographical location -- I 5 think I saw a reference to it in the annual 6 report -- does that contribute at all to the 7 drug-related activity that -- 8 A. I believe that's why -- partly why 9 it was designated a high drug trafficking -- 10 high intensity drug trafficking area, is 11 it's the 7- -- 71, Interstate 71 and 77, 80, 12 and the location to source cities and how close 13 in proximity all the source cities are to 14 Summit County, and accessibility through our 15 roadways. So I believe that is in effect. 16 Q. Who -- which would be the source 17 cities that you're referring to? 18 A. Detroit, Chicago, New York. 19 Q. And source cities for what -- 20 A. Drugs. 21 Q. -- types of drugs? Any types of 22 drugs? 23 A. I believe that, yes. 24 Q. Okay. 25 MR. BLOCK: Probably a good</p>	<p style="text-align: right;">Page 168</p> <p>1 MR. BLOCK: -- manufacturers and 2 the pharmacies will have some questions for 3 you, too, but of likely much shorter duration 4 since I -- we -- we drew the laboring oar on 5 this one. So that's kind of where we're -- 6 where we're headed. 7 MR. LEDLIE: Okay. Appreciate 8 that. 9 BY MR. BLOCK: 10 Q. Okay. I had intended to ask you, 11 and then I lost my train of thought, about 12 equipment that the drug unit has, other than 13 the cars in the fleet. What -- what equipment 14 is there? 15 A. We have covert audio and video 16 devices, equipment to monitor phone calls, GPS 17 tracking units, cameras, things like that. 18 Q. Any other major types of equipment? 19 A. The -- the major equipment is 20 the -- the phone monitoring equipment. The 21 other stuff isn't -- 22 Q. Who -- who is that provided by? 23 A. Originally, it was purchased on a 24 grant before my time, like 2010. And then the 25 system became outdated. So the DEA provides</p>
<p style="text-align: right;">Page 167</p> <p>1 breaking spot for lunch if it's here. Right? 2 Are we -- 3 MR. LEDLIE: Yeah. It's 12:05. 4 THE WITNESS: I could use some 5 water. 6 MR. BLOCK: Yeah. Okay. Let's -- 7 let's take a break, see if lunch is here. If 8 it's not, we can go back for another 30 minutes 9 and then break. 10 THE VIDEOGRAPHER: Off the record 11 at 12:08 p.m. 12 (Luncheon recess.) 13 THE VIDEOGRAPHER: Back on the 14 record at 1:03 p.m. 15 MR. BLOCK: A little roadmap for 16 you and your counsel where I think we're going. 17 Now I've got some random things 18 I've got to go back and -- and fill in, and 19 then I think I've -- famous last words, but got 20 an hour or so questions that I want to ask, and 21 then when -- roughly at our next break, I'm 22 going to pass the microphone to Mr. Pulsipher, 23 who's got probably one or two modules to cover, 24 and then I think some of the counsel for the -- 25 MR. LEDLIE: Manufacturers.</p>	<p style="text-align: right;">Page 169</p> <p>1 the equipment now, which saves a big expense 2 for the drug unit. 3 Q. Can you tell me if this -- the 4 following statement is correct or incorrect? 5 A. Okay. 6 Q. In 2016, the drug unit created an 7 Opiate Task Force to handle overdose 8 investigations? 9 MR. LEDLIE: Object to the form. 10 A. There were a couple guys assigned, 11 if that's what you're asking, to respond to 12 overdose deaths. I don't know if you could 13 call it a task force, but -- 14 Q. Okay. Who -- who from the drug 15 unit was assigned? 16 A. Oh, I -- I'm sorry. It was the 17 detective bureau. 18 Q. That we talked about earlier? 19 A. Yeah. I'm sorry. 20 Q. No, no. That's fine. I forgot the 21 names, but the -- 22 A. Jason Kline and Larry Brown. 23 Q. Okay. And that started around 24 2016? 25 A. I think so.</p>

<p style="text-align: right;">Page 170</p> <p>1 Q. All right. Can you think of a --</p> <p>2 would you agree that -- that in any -- for</p> <p>3 example, from 2017, would you agree that the</p> <p>4 majority of seizures of drugs in connection</p> <p>5 with arrests were of illicit drugs as opposed</p> <p>6 to prescription medications?</p> <p>7 A. Statistically, I would say we</p> <p>8 probably seized more crystal methamphetamine</p> <p>9 and fentanyl and heroin than any other drug.</p> <p>10 Q. Has there ever been a year that you</p> <p>11 can think of when you've been involved with the</p> <p>12 drug unit where more prescription medication</p> <p>13 was seized than non-prescription medication?</p> <p>14 A. I'm thinking back. We had a</p> <p>15 really -- we had a large seizure, and I don't</p> <p>16 remember what year -- you probably have it --</p> <p>17 from a search warrant we did. The gentleman</p> <p>18 had quite a few prescription pills. I don't</p> <p>19 know if that outweighed the heroin or cocaine</p> <p>20 seized that year, but I can't think of the</p> <p>21 year.</p> <p>22 Q. What -- do you remember the</p> <p>23 guy's -- person's name?</p> <p>24 A. I don't remember the subject's</p> <p>25 name, no.</p>	<p style="text-align: right;">Page 172</p> <p>1 A. He is.</p> <p>2 Q. -- department?</p> <p>3 A. He is.</p> <p>4 Q. Okay. On Exhibit 2, which you</p> <p>5 have -- oh, good, you still have it in front of</p> <p>6 you. It is -- this was a questionnaire you --</p> <p>7 to the Ohio Office of Criminal Justice</p> <p>8 Services. And do you see that it's broken down</p> <p>9 into -- the first part is "Non-Pharmaceutical</p> <p>10 Drug Questions." So that starts at page 1- --</p> <p>11 108473. And then starting on page 108475 there</p> <p>12 are questions entitled "Pharmaceutical</p> <p>13 Diversion Questions."</p> <p>14 A. Yes.</p> <p>15 Q. Do you see that? Okay.</p> <p>16 And on "Pharmaceutical Diversion</p> <p>17 Questions," so page 108475, the first question</p> <p>18 is, "Does your task force have a devoted</p> <p>19 diversion unit or diversion officers?"</p> <p>20 Do you see that?</p> <p>21 A. Uh-huh.</p> <p>22 Q. I'm sorry. I just need a yes or</p> <p>23 a --</p> <p>24 A. Oh, I'm sorry. Yes.</p> <p>25 Q. Okay. And this -- this, from 2012,</p>
<p style="text-align: right;">Page 171</p> <p>1 Q. Or where he lived?</p> <p>2 A. It was Akron.</p> <p>3 Q. Okay.</p> <p>4 A. The city of Akron.</p> <p>5 Q. Seized from his house?</p> <p>6 A. Yes.</p> <p>7 Q. And do you remember what kind of</p> <p>8 prescription medication he had?</p> <p>9 A. I remember -- I remember some</p> <p>10 opioids, and I remember Xanax. That's about</p> <p>11 the best of my recollection.</p> <p>12 Q. And did that -- had that indi- --</p> <p>13 had that -- sorry.</p> <p>14 Were those medications, had they</p> <p>15 been prescribed to that individual directly, or</p> <p>16 he'd obtained them from other sources? Are you</p> <p>17 following what I'm saying?</p> <p>18 A. Yeah, I know what you're saying. I</p> <p>19 don't recall what -- I -- I don't know if they</p> <p>20 -- I know the detective that handled that case.</p> <p>21 I'm not sure if he ran an OARRS report. It was</p> <p>22 a substantial amount, so I -- I...</p> <p>23 Q. Who was -- which detective?</p> <p>24 A. It was Detective Ryan Knight.</p> <p>25 Q. Is he still with the --</p>	<p style="text-align: right;">Page 173</p> <p>1 was checked "No"; is that correct?</p> <p>2 A. That is checked "No."</p> <p>3 Q. Is that -- and would -- that was</p> <p>4 accurate in 2012?</p> <p>5 A. This is a 2011 grant number, so I'm</p> <p>6 trying to determine -- okay. I'm trying to</p> <p>7 determine if this was prior to Lori</p> <p>8 Baker-Stella --</p> <p>9 Q. Okay.</p> <p>10 A. -- or if I was thinking that she</p> <p>11 was assigned through us, so I didn't put "yes"</p> <p>12 on there.</p> <p>13 Q. I -- if -- I'm not trying to trick</p> <p>14 you. I'm just trying to get clarity. I will</p> <p>15 tell you, like, I can -- I can get it out, but,</p> <p>16 like, one from 2016 still says "no" on that</p> <p>17 question.</p> <p>18 A. Oh, okay. Okay. Then I must have</p> <p>19 interpreted this as -- as someone on the drug</p> <p>20 unit is not dedicated to diversion.</p> <p>21 Q. Okay.</p> <p>22 A. And there was a time the stats</p> <p>23 were -- we were allowed to claim Lori</p> <p>24 Baker-Stella's stats in some instances, and</p> <p>25 some not. Like, I don't remember if it was</p>

<p style="text-align: right;">Page 174</p> <p>1 HIDTA that didn't allow us to claim them,  2 but -- or maybe it was OCJS didn't allow us to  3 claim them but HIDTA did. It's one or the  4 other.  5 Q. So it sounds like Lori Baker-Stella  6 is sort of quasi in the drug unit and --  7 A. Yeah. The best way to describe  8 that is, but for the drug unit she wouldn't be  9 there. Do you know what I'm saying? If the  10 drug unit didn't exist, she probably wouldn't  11 have that -- she wouldn't be in that position,  12 and the sheriff pays her salary. Do you  13 understand what I'm saying?  14 Q. No, but --  15 A. Okay.  16 Q. -- that's my fault, not yours.  17 So --  18 A. Okay.  19 Q. -- okay. I probably do if I think  20 about it hard enough, but I'm --  21 A. Okay.  22 Q. -- having trouble at the moment.  23 We talked a little bit about the --  24 the K9 --  25 A. Yes.</p>	<p style="text-align: right;">Page 176</p> <p>1 Q. Has FedEx been cooperative in  2 terms --  3 A. Yes.  4 Q. Yes?  5 A. Yes.  6 Q. How about UPS?  7 A. Not -- not as cooperative as FedEx.  8 Q. Has that been the case throughout  9 your time on the drug unit?  10 A. Yes.  11 Q. On Exhibit 2, we were just looking  12 at pharmaceutical diversion questions. And  13 Question 2 on this report asks for a total  14 number of pharmaceutical cases initiated during  15 the reporting period, and it says that there  16 was one -- is it 20- -- I guess this would be  17 from 2011? Is that what --  18 A. That's -- that's what I'm thinking.  19 This is a 2011 grant number. I'm -- well,  20 project start date. No, this would be 2012.  21 Q. 2012, Okay. And it says one  22 pharmaceutical case initiated during the  23 reporting period, and it looks like, from the  24 answer to the next question, that a nurse was  25 the target of the investigation.</p>
<p style="text-align: right;">Page 175</p> <p>1 Q. -- associated with the drug unit.  2 Does that K9 unit ever work at the post office?  3 A. Very rarely.  4 Q. Why is that?  5 A. The post office is a difficult  6 place to -- to -- the postal inspector has to  7 be at the office when you're there, and he --  8 and you have to have a federal warrant to open  9 the packages. And the K9 officer doesn't have  10 federal credentials, and I don't know if that  11 would even matter at the post office. So he's  12 based out of Cleveland, the postal inspector.  13 So it's when he's available. It's on his  14 schedule.  15 Q. If -- if you had your way, would  16 you prefer that the K9 unit be able to go to  17 the post office more frequently than it does?  18 A. Sure. Yes, I would like that.  19 Q. How about UPS? Does the K9 unit  20 ever --  21 A. On occasion.  22 Q. -- work at a UPS facility?  23 You mentioned that FedEx -- that  24 FedEx is another one.  25 A. Uh-huh, yes.</p>	<p style="text-align: right;">Page 177</p> <p>1 Do you see that?  2 A. Yes.  3 Q. Do you have any rec- --  4 recollection what that was about?  5 A. No. I'm remembering a couple cases  6 with a nurse, but I don't -- I'm not sure if  7 it's this case.  8 Q. Okay. It goes -- and Question  9 No. 5, it says that there was one person  10 indicted for a Felony IV.  11 A. Okay.  12 Q. Do you see that?  13 A. I do see that.  14 Q. Would -- would that mean that the  15 nurse who was the target of the investigation  16 was indicted?  17 A. That's what that would indicate.  18 Q. Okay. What -- I understand you  19 don't know for sure which is which, but what  20 cases do you remember involving -- you said you  21 remember a couple cases with a nurse. What do  22 you -- what do you remember?  23 A. I remember one case in particular,  24 the subject of the investigation was dealing  25 steroids, and then the search warrant, at his</p>

<p style="text-align: right;">Page 178</p> <p>1 house they discovered she was bringing home</p> <p>2 medications that belonged to other people.</p> <p>3 They were labeled in other people's names.</p> <p>4 That may be the one I'm thinking of.</p> <p>5 The other one I'm remembering is an</p> <p>6 undercover purchase, from a nurse, of</p> <p>7 medication.</p> <p>8 Q. Do you remember what kind of</p> <p>9 medication?</p> <p>10 A. I don't.</p> <p>11 Q. Okay. And this -- the nurse -- the</p> <p>12 person who was in the steroid investigation</p> <p>13 that the search warrant revealed other</p> <p>14 medications at the house, were those steroids,</p> <p>15 or what was at the house?</p> <p>16 A. That -- that were in her po- -- she</p> <p>17 was a nurse, and she -- it wasn't steroids.</p> <p>18 Q. Okay. Do you remember what it was?</p> <p>19 A. I don't.</p> <p>20 Q. Okay. Can you think of any</p> <p>21 other -- remember any other cases involving</p> <p>22 nurses?</p> <p>23 A. I can't recall any.</p> <p>24 Q. Any cases involving doctors?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 180</p> <p>1 what this lawsuit is about?</p> <p>2 A. I believe I do.</p> <p>3 Q. What is your understanding?</p> <p>4 A. That the manufacturers and</p> <p>5 distributors -- distributors used deceptive</p> <p>6 tactics and passed the drugs off as safe with a</p> <p>7 very low addiction rate, and provided more</p> <p>8 pills to a community than they had residents,</p> <p>9 is basically my understanding of it.</p> <p>10 Q. I'm going to ask you -- I'm going</p> <p>11 to go through some of the parties that are</p> <p>12 named as Defendants in --</p> <p>13 A. Okay.</p> <p>14 Q. -- this suit and ask if you're</p> <p>15 familiar with them.</p> <p>16 In no particular order, McKesson?</p> <p>17 Are you familiar with McKesson?</p> <p>18 A. Are you asking, like, if I've heard</p> <p>19 of them or we've investigated them?</p> <p>20 Q. I'll start with have you heard of</p> <p>21 McKesson.</p> <p>22 A. I have not heard of McKesson.</p> <p>23 Q. All right. And has the drug unit</p> <p>24 ever investigated McKesson?</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 179</p> <p>1 Q. Any cases involving pharmacies?</p> <p>2 A. That the Summit County Drug Unit</p> <p>3 initiated?</p> <p>4 Q. Sure.</p> <p>5 A. No.</p> <p>6 Q. Any cases involving manufacturers?</p> <p>7 A. No.</p> <p>8 Q. Any cases involving distributors?</p> <p>9 MR. LEDLIE: Object to form.</p> <p>10 Q. And by "distributors" I mean</p> <p>11 licensed distributors --</p> <p>12 A. Licensed distributors --</p> <p>13 Q. -- to distribute prescription</p> <p>14 medications.</p> <p>15 A. No, we haven't.</p> <p>16 Q. Have you -- have you seen the</p> <p>17 complaint in this lawsuit?</p> <p>18 A. I did.</p> <p>19 Q. Did you read it?</p> <p>20 A. I did not.</p> <p>21 Q. I don't blame you.</p> <p>22 A. I -- I did look at a few pages of</p> <p>23 it in the Ohio section, but I didn't have time</p> <p>24 to --</p> <p>25 Q. Do you have an understanding of</p>	<p style="text-align: right;">Page 181</p> <p>1 MR. LEDLIE: Object to the form.</p> <p>2 Q. Do you know whether the sheriff's</p> <p>3 office has ever investigated McKesson?</p> <p>4 A. I do not know.</p> <p>5 Q. All right. And are you aware of</p> <p>6 any facts regarding anything that McKesson did</p> <p>7 or didn't do that relate to this lawsuit?</p> <p>8 A. I'm not.</p> <p>9 Q. Next, Cardinal Health. Are you</p> <p>10 familiar with Cardinal Health?</p> <p>11 A. I've never heard of Cardinal</p> <p>12 Health.</p> <p>13 Q. All right. I have to go through</p> <p>14 these questions --</p> <p>15 A. Okay.</p> <p>16 Q. -- so we may get into a routine</p> <p>17 here.</p> <p>18 But have you -- are you aware of</p> <p>19 whether the drug unit has ever investigated</p> <p>20 Cardinal Health?</p> <p>21 MR. LEDLIE: Objection. Calls for</p> <p>22 speculation.</p> <p>23 A. In my time, no.</p> <p>24 Q. All right. How about the sheriff's</p> <p>25 office?</p>

<p style="text-align: right;">Page 182</p> <p>1 A. Not that I'm aware of.</p> <p>2 Q. And are you aware of any facts</p> <p>3 regarding anything Cardinal Health did or</p> <p>4 didn't do that relate to this lawsuit?</p> <p>5 MR. LEDLIE: Object to the form of</p> <p>6 the question.</p> <p>7 A. Not in my time.</p> <p>8 Q. AmerisourceBergen. Have you heard</p> <p>9 of AmerisourceBergen?</p> <p>10 A. I have not heard of</p> <p>11 AmerisourceBergen.</p> <p>12 Q. Okay. Has the drug unit ever</p> <p>13 investigated AmerisourceBergen?</p> <p>14 MR. LEDLIE: Object to the form.</p> <p>15 Calls for speculation.</p> <p>16 A. Not that I'm aware of during my</p> <p>17 tenure.</p> <p>18 Q. Okay. How about the sheriff's</p> <p>19 office?</p> <p>20 MR. LEDLIE: Object to the form.</p> <p>21 Calls for speculation.</p> <p>22 A. Not that I'm aware of.</p> <p>23 Q. All right. And are you aware of</p> <p>24 any -- do you know of any facts regarding what</p> <p>25 AmerisourceBergen did or didn't do that relate</p>	<p style="text-align: right;">Page 184</p> <p>1 A. I've never heard of ANDA.</p> <p>2 Q. All right. Do you know whether the</p> <p>3 sheriff's -- excuse me -- the drug unit has</p> <p>4 ever investigated ANDA?</p> <p>5 MR. LEDLIE: Object to the form of</p> <p>6 the question. He doesn't know who ANDA is.</p> <p>7 A. Not that I'm aware of.</p> <p>8 Q. Or the sheriff's office?</p> <p>9 A. Not that I'm aware of.</p> <p>10 MR. LEDLIE: Object to the form of</p> <p>11 the question. Calls for speculation.</p> <p>12 MR. BLOCK: I'd be happy to give</p> <p>13 you a standing objection if you'd like, or you</p> <p>14 can -- whichever is --</p> <p>15 MR. LEDLIE: No. I'll -- I'll make</p> <p>16 the objections --</p> <p>17 MR. BLOCK: Okay.</p> <p>18 MR. LEDLIE: -- if you're going to</p> <p>19 ask him about companies he said he's not --</p> <p>20 he's never heard of.</p> <p>21 MR. BLOCK: Yeah. I'm just going</p> <p>22 to go down my list.</p> <p>23 MR. LEDLIE: Okay. No problem.</p> <p>24 MR. BLOCK: Okay.</p> <p>25 BY MR. BLOCK:</p>
<p style="text-align: right;">Page 183</p> <p>1 to this lawsuit?</p> <p>2 MR. LEDLIE: Object to the form.</p> <p>3 Calls for speculation.</p> <p>4 A. I do not.</p> <p>5 Q. H.D. Smith?</p> <p>6 A. I've never heard of H.D. Smith.</p> <p>7 Q. All right. Has the drug unit ever</p> <p>8 investigated H.D. Smith?</p> <p>9 MR. LEDLIE: Object to the form.</p> <p>10 Calls for speculation.</p> <p>11 A. Not that I'm aware of during my</p> <p>12 tenure.</p> <p>13 Q. All right. And how about the</p> <p>14 sheriff's office?</p> <p>15 MR. LEDLIE: Object to the form.</p> <p>16 Calls for speculation.</p> <p>17 A. Not that I'm aware of.</p> <p>18 Q. All right. And are you -- are you</p> <p>19 aware of any facts regarding what H.D. Smith</p> <p>20 did or did not do related to this lawsuit?</p> <p>21 MR. LEDLIE: Object to the form.</p> <p>22 Calls for speculation.</p> <p>23 A. I don't know.</p> <p>24 Q. ANDA, A-N-D-A, are you familiar</p> <p>25 with that company?</p>	<p style="text-align: right;">Page 185</p> <p>1 Q. I'm sorry. So did we get your</p> <p>2 answer? "Not that I'm aware of."</p> <p>3 All right. And are you aware of</p> <p>4 any facts regarding what ANDA did or did not do</p> <p>5 that relate to the lawsuit?</p> <p>6 MR. LEDLIE: Object to the form of</p> <p>7 the question. Calls for speculation.</p> <p>8 A. No, I do not know.</p> <p>9 Q. All right. Purdue Pharma, are you</p> <p>10 familiar with Purdue Pharma?</p> <p>11 A. I've heard of Purdue Pharma.</p> <p>12 Q. Okay. Do -- has the sheriff's --</p> <p>13 I'm sorry. Has the drug unit ever investigated</p> <p>14 Purdue Pharma?</p> <p>15 A. Not that I'm aware of.</p> <p>16 Q. All right. How about the sheriff's</p> <p>17 office?</p> <p>18 A. Not that I'm aware of.</p> <p>19 Q. All right. Are you aware of any</p> <p>20 facts regarding what Purdue Pharma did or did</p> <p>21 not do that relate to the lawsuit?</p> <p>22 A. I do not know.</p> <p>23 Q. A company called Actavis?</p> <p>24 A. I've never heard of Actavis.</p> <p>25 Q. All right. Has the sheriff -- has</p>



<p style="text-align: right;">Page 186</p> <p>1 the drug unit ever investigated Actavis?</p> <p>2 MR. LEDLIE: Object to the form of</p> <p>3 the question. Calls for speculation. Asked</p> <p>4 and answered.</p> <p>5 A. Not that I'm aware of.</p> <p>6 Q. All right. Or the sheriff's</p> <p>7 office? I'm sorry, as to the sheriff's office.</p> <p>8 The drug unit?</p> <p>9 MR. LEDLIE: Object to the form of</p> <p>10 the question. Calls for speculation.</p> <p>11 A. Not that I'm aware of.</p> <p>12 Q. All right. And are you aware of</p> <p>13 any facts regarding what Actavis did or did not</p> <p>14 do that's related to this lawsuit?</p> <p>15 MR. LEDLIE: Object to the form of</p> <p>16 the question. Asked and answered.</p> <p>17 A. I do not know.</p> <p>18 Q. Company called Cephalon,</p> <p>19 C-e-p-h-a-l-o-n?</p> <p>20 A. I -- I may have heard. I don't</p> <p>21 think so. I don't think I know who they are.</p> <p>22 Q. Has the drug unit ever investigated</p> <p>23 Cephalon?</p> <p>24 MR. LEDLIE: Object to the form of</p> <p>25 the question.</p>	<p style="text-align: right;">Page 188</p> <p>1 do as it relates to this lawsuit?</p> <p>2 MR. LEDLIE: Object to the form of</p> <p>3 the question.</p> <p>4 A. I do not know.</p> <p>5 Q. Endo?</p> <p>6 I've got nine more of these, just</p> <p>7 so you know.</p> <p>8 Endo. Have you ever heard of Endo</p> <p>9 Pharmaceuticals?</p> <p>10 A. No.</p> <p>11 Q. All right. Has the drug unit ever</p> <p>12 investigated Endo?</p> <p>13 MR. LEDLIE: Object to the form of</p> <p>14 the question. Calls for speculation.</p> <p>15 A. Not that I'm aware of.</p> <p>16 Q. Or the sheriff's office?</p> <p>17 MR. LEDLIE: The same objection.</p> <p>18 A. Not that I'm aware of.</p> <p>19 Q. All right. And are you aware of</p> <p>20 any facts regarding what Endo did or did not do</p> <p>21 as it pertains to this lawsuit?</p> <p>22 A. No.</p> <p>23 MR. LEDLIE: Object to the form of</p> <p>24 the question.</p> <p>25 Q. Insys Therapeutics?</p>
<p style="text-align: right;">Page 187</p> <p>1 A. Not that I know of.</p> <p>2 Q. The sheriff's office?</p> <p>3 A. Not that I know of.</p> <p>4 MR. LEDLIE: Object to the form of</p> <p>5 the question.</p> <p>6 Q. And are you aware of any facts</p> <p>7 regarding what Cephalon did or did not do</p> <p>8 that's related to the lawsuit?</p> <p>9 MR. LEDLIE: Object to the form of</p> <p>10 the question. Compound.</p> <p>11 A. I do not know.</p> <p>12 Q. Janssen? Ever heard of Janssen?</p> <p>13 A. No, I don't know who Janssen is.</p> <p>14 Q. Has the drug unit ever investigated</p> <p>15 Janssen?</p> <p>16 MR. LEDLIE: Object to the form of</p> <p>17 the question. Asked and answered.</p> <p>18 A. Not that I'm aware of.</p> <p>19 Q. All right. Or the sheriff's</p> <p>20 office?</p> <p>21 MR. LEDLIE: Object to the form of</p> <p>22 the question.</p> <p>23 A. Not that I'm aware of.</p> <p>24 Q. All right. And are you aware of</p> <p>25 any facts regarding what Janssen did or did not</p>	<p style="text-align: right;">Page 189</p> <p>1 A. No, I've never heard of them.</p> <p>2 Q. All right. And has the drug unit</p> <p>3 ever investigated Insys?</p> <p>4 MR. LEDLIE: Object to the form of</p> <p>5 the question.</p> <p>6 A. Not that I'm aware of.</p> <p>7 Q. Okay. Or the sheriff's office?</p> <p>8 MR. LEDLIE: The same objection.</p> <p>9 A. Not that I'm aware of.</p> <p>10 Q. And are you aware of any facts</p> <p>11 regarding what Insys did or did not do as it</p> <p>12 pertains to this lawsuit?</p> <p>13 MR. LEDLIE: Object to the form of</p> <p>14 the question.</p> <p>15 A. I do not know.</p> <p>16 Q. Mallinckrodt?</p> <p>17 A. I've never heard of Mallinckrodt.</p> <p>18 Q. So has the drug unit ever</p> <p>19 investigated Mallinckrodt?</p> <p>20 MR. LEDLIE: Object to the form of</p> <p>21 the question.</p> <p>22 A. Not that I'm aware of.</p> <p>23 Q. Or the sheriff's office?</p> <p>24 MR. LEDLIE: Object to the form of</p> <p>25 the question.</p>

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1 A. Not that I'm aware of.  
 2 Q. And are you aware of any facts  
 3 regarding what Mallinckrodt did or did not do  
 4 as it pertains to this -- this lawsuit?  
 5 MR. LEDLIE: Object to the form of  
 6 the question.  
 7 A. I do not know.  
 8 Q. Discount Drug Mart?  
 9 MR. LEDLIE: Object to the form --  
 10 actually, no objection.  
 11 Q. Have you heard of Discount Drug  
 12 Mart?  
 13 A. I have heard of Discount Drug Mart.  
 14 Q. Okay. Has the sher- -- has the  
 15 drug unit ever investigated Discount Drug Mart?  
 16 MR. LEDLIE: Object to the form of  
 17 the question.  
 18 A. Not that I'm aware of.  
 19 Q. All right. Or the sheriff's  
 20 office?  
 21 A. Not that I'm aware of.  
 22 Q. Are you aware of any facts  
 23 regarding what Discount Drug Market [sic] did  
 24 or did not do as it pertains to this lawsuit?  
 25 MR. LEDLIE: Object to the form of

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1 the question.  
 2 A. I do not.  
 3 Q. Prescription Supply, have you heard  
 4 of that company?  
 5 A. No.  
 6 Q. All right. And has the drug unit  
 7 ever investigated Prescription Supply?  
 8 MR. LEDLIE: Object to the form of  
 9 the question.  
 10 A. Not that I'm aware of.  
 11 Q. Or the sheriff's office?  
 12 MR. LEDLIE: Same objection.  
 13 A. Not that I'm aware of.  
 14 Q. And are you aware of --  
 15 THE REPORTER: Did -- I didn't get  
 16 an answer. I'm sorry.  
 17 THE WITNESS: Not that I'm aware  
 18 of.  
 19 THE REPORTER: Thank you.  
 20 Q. And are you aware of any facts  
 21 regarding what Prescription Supply did or did  
 22 not do as it relates to this lawsuit?  
 23 MR. LEDLIE: Object to the form of  
 24 the question.  
 25 A. I do not know.

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1 Q. CVS, have you heard of CVS?  
 2 A. I have heard of CVS.  
 3 Q. All right. Has the drug unit ever  
 4 investigated CVS?  
 5 A. Not that I know of.  
 6 Q. All right. Or the sheriff's  
 7 department?  
 8 MR. LEDLIE: Object to the form of  
 9 the question.  
 10 A. Not that I know of.  
 11 Q. And are you aware of any facts  
 12 regarding what CVS did or did not do as it  
 13 relates to this lawsuit?  
 14 A. No.  
 15 Q. HBC Service Company, have you ever  
 16 heard of that?  
 17 A. I've never heard of HBC Service  
 18 Company.  
 19 Q. Okay. Has the drug unit ever  
 20 investigated HBC Service Company?  
 21 MR. LEDLIE: Object to the form of  
 22 the question. Calls for speculation.  
 23 A. Not that I'm aware of.  
 24 Q. The sheriff's office?  
 25 MR. LEDLIE: The same objection.

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1 A. Not that I'm aware of.  
 2 Q. All right. And are you aware of  
 3 any facts regarding what HBC Service Company  
 4 did or did not do as it relates to this  
 5 litigation?  
 6 MR. LEDLIE: Object to the form of  
 7 the question.  
 8 A. No.  
 9 Q. Three more. Rite Aid?  
 10 A. I've heard of Rite Aid.  
 11 Q. All right. Has the drug unit ever  
 12 investigated Rite Aid?  
 13 A. Not that I'm aware of.  
 14 Q. All right. The sheriff's office?  
 15 A. Not that I'm aware of.  
 16 Q. And are you aware of any facts  
 17 regarding what Rite Aid did or did not do as it  
 18 relates to this litigation?  
 19 A. No.  
 20 Q. Walgreens. Have you heard of  
 21 Walgreens?  
 22 A. I have heard of Walgreens.  
 23 Q. Okay. Has the drug unit ever  
 24 investigated Walgreens?  
 25 A. Not that I'm aware of.

<p style="text-align: right;">Page 194</p> <p>1 Q. The sheriff's office?</p> <p>2 A. I don't know.</p> <p>3 Q. And are you aware of any facts</p> <p>4 regarding what Walgreens did or did not do as</p> <p>5 it relates to this litigation?</p> <p>6 A. No.</p> <p>7 Q. And Walmart, have you heard of</p> <p>8 Walmart?</p> <p>9 A. Yes.</p> <p>10 Q. All right. And has the drug unit</p> <p>11 ever investigated Walmart?</p> <p>12 A. Not that I'm aware of.</p> <p>13 Q. Has the sheriff's office?</p> <p>14 A. I do not know.</p> <p>15 Q. And are you aware of any facts</p> <p>16 regarding what Walmart did or did not do as it</p> <p>17 relates to this litigation?</p> <p>18 A. No.</p> <p>19 Q. We looked at -- earlier, in</p> <p>20 Exhibit 1, which was the annual report from the</p> <p>21 sheriff's office, there was the paragraph at</p> <p>22 the beginning from the -- I just -- just for</p> <p>23 reference to a phrase, but I don't necessarily</p> <p>24 mean -- there was a reference in Chief Barry --</p> <p>25 sorry, Sheriff Barry's remarks to combatting</p>	<p style="text-align: right;">Page 196</p> <p>1 MR. LEDLIE: Object to the form.</p> <p>2 Q. Would -- is that a fair way to</p> <p>3 describe them?</p> <p>4 A. Yes.</p> <p>5 Q. And, then, would you agree that</p> <p>6 the -- whoever's supplying the -- the drug</p> <p>7 dealers, wherever they're getting those -- that</p> <p>8 heroin and fentanyl from, those people</p> <p>9 responsible for that also bear a responsibility</p> <p>10 for the opioid crisis in Summit County?</p> <p>11 A. I could agree with that.</p> <p>12 Q. All right. How about the people</p> <p>13 that are buying or using the heroin or the</p> <p>14 fentanyl? Do they bear some of the</p> <p>15 responsibility?</p> <p>16 A. I believe they do.</p> <p>17 Q. Who -- and who else? Who, if</p> <p>18 anyone else, would be responsible for this</p> <p>19 opioid crisis?</p> <p>20 A. Just from personal experience with</p> <p>21 people I know, and -- and I believe it didn't</p> <p>22 start with heroin and fentanyl.</p> <p>23 Q. When you say "it didn't start" --</p> <p>24 I'm sorry -- what do you mean?</p> <p>25 A. The -- the epidemic and all the</p>
<p style="text-align: right;">Page 195</p> <p>1 the opioid crisis. And I say that only to</p> <p>2 frame the -- the concept of the -- of an opioid</p> <p>3 crisis.</p> <p>4 A. Okay.</p> <p>5 Q. Do -- first of all, do you -- are</p> <p>6 you of the view that there's an opioid crisis</p> <p>7 in Summit County?</p> <p>8 A. I believe that.</p> <p>9 Q. What -- what does that entail?</p> <p>10 What do you mean? What's your understanding of</p> <p>11 the opioid crisis in Summit County?</p> <p>12 A. I think it -- when a drug</p> <p>13 disproportionately affects the community, it</p> <p>14 becomes a crisis or an epidemic, and I think</p> <p>15 that's what we're going through right now.</p> <p>16 Q. What drug? What -- what is the</p> <p>17 drug or drugs that you're referring to?</p> <p>18 A. The fentanyl and heroins.</p> <p>19 Q. And would you agree that the people</p> <p>20 selling the heroin and the fentanyl bear at</p> <p>21 least some responsibility for that crisis?</p> <p>22 A. Sure. Yes.</p> <p>23 Q. And can we call those the drug</p> <p>24 dealers, I guess?</p> <p>25 A. Okay.</p>	<p style="text-align: right;">Page 197</p> <p>1 death and -- and destruction. Many of the</p> <p>2 people I've spoke to, it did actually start</p> <p>3 with prescription medication, and when they</p> <p>4 couldn't afford it, they switched to a cheaper</p> <p>5 version.</p> <p>6 Q. And how many -- how many people</p> <p>7 have you spoken to on this topic?</p> <p>8 A. Over the years, I -- I don't know</p> <p>9 how many. I mean, just in my inner circle of</p> <p>10 family and friends, maybe 10, but through my</p> <p>11 work, I'm sure there's been many more.</p> <p>12 Q. When is the first conversation you</p> <p>13 remember having with anyone where a connection</p> <p>14 or potential connection between prescription</p> <p>15 medication and heroin or fentanyl use was</p> <p>16 mentioned?</p> <p>17 MR. LEDLIE: Object to the form.</p> <p>18 You can answer.</p> <p>19 A. I don't recall my first</p> <p>20 conversation. I -- I -- I would have a real</p> <p>21 hard time pinning that down, to be completely</p> <p>22 honest, when I --</p> <p>23 Q. Do you know whether it was before</p> <p>24 or after you became commander of the drug unit?</p> <p>25 A. It was definitely after.</p>

<p style="text-align: right;">Page 198</p> <p>1 Q. And could you -- can you describe 2 for me -- can you -- can you describe any 3 conversation with any person with specificity 4 on this topic? 5 A. Probably. 6 Q. Okay. I -- I need to ask you to do 7 that, please. 8 A. Okay. 9 Q. So we can start -- if you've got a 10 conversation in mind -- tell me when you've got 11 a specific conversation in mind, and then I'll 12 try to explore it. 13 A. Well, obviously, the one that 14 sticks out most in my mind we started to talk 15 about was my sister. 16 Q. Okay. 17 A. That's the one most recently sticks 18 in my mind. 19 Q. Okay. So let's cover that. 20 A. Okay. 21 Q. And this was regarding your niece? 22 A. Correct. 23 Q. That's your sister's daughter? 24 A. It's my brother's daughter. 25 Q. Your brother's daughter, okay.</p>	<p style="text-align: right;">Page 200</p> <p>1 successfully raised a daughter. She's 16 or 17 2 now. 3 She -- my niece went to rehab, met 4 another drug user in rehab, and they had twin 5 girls together. She used heroin the first four 6 months of her pregnancy, ended up going to 7 rehab, and had the babies while she was at a 8 rehab facility. She got out, and August 15th 9 she died. She had a heroin overdose. And now 10 my wife and I have custody of two twin baby 11 girls. 12 So that's the most recent 13 conversation I can remember. 14 Q. How old are the girls? 15 A. Two. 16 Q. Where did -- where did your niece 17 live? 18 A. She lived in Canal Fulton area. 19 Q. I'm sorry -- 20 A. She -- she -- she didn't have very 21 stable residences, I guess is the best way to 22 put that. 23 Q. But here -- here in Ohio? 24 A. Yeah, in Ohio. Stark County. 25 Q. Okay. And how -- how did your</p>
<p style="text-align: right;">Page 199</p> <p>1 What -- tell me about the conversation with 2 your sister. 3 A. Well, I think I was originally 4 scheduled for this deposition at the end of 5 August; is -- is that right? 6 Q. I don't know. 7 A. Oh, you don't know? 8 Q. But I -- I -- probably. 9 A. I -- I think it was. 10 Q. I believe you. I believe you. 11 Yeah. 12 A. And I saw my sister at the 13 beginning of August, and I told her I had to 14 come to this dep- -- deposition, and she said, 15 "Good. I'm glad somebody is doing it." 16 And I said, "Why? Like, I'm 17 not" -- "really not looking forward to it." 18 And she said, "Well, that's how 19 your niece started." 20 She started on Percocets her and 21 her husband got from the doctor, and then when 22 they cut them off, they switched to heroin. 23 So my niece had -- had a child with 24 her first husband. The child was taken away. 25 The husband got treatment, got clean, and</p>	<p style="text-align: right;">Page 201</p> <p>1 sister -- how do you know whether the issue 2 started with the prescription medication? 3 What's the basis for that? 4 A. My niece confided in my sister. I 5 don't have the -- she didn't talk to me about 6 it. She confided in my sister. 7 Q. I see. All right. 8 Are there any other conversations 9 where this -- this topic -- and by "this topic" 10 I mean the association or potential association 11 with prescription medication use to -- 12 Actually, before that, may I just 13 ask you, do you know what the doctor had 14 prescribed the medication for? 15 A. She -- my sister told me it was 16 Percocet. 17 Q. But -- but why? 18 A. A dentist gave them to one of them. 19 Gave them to either the husband, and he shared 20 them with her, or gave them to her. I don't 21 know the exact details. 22 Q. Do you know whether anyone was 23 prosecuted in connection with the death of your 24 niece? 25 A. So far, no.</p>

<p style="text-align: right;">Page 202</p> <p>1 Q. Do you know whether there's an 2 investigation?</p> <p>3 A. I don't know if Canal Fulton is 4 conducting an investigation or not.</p> <p>5 Q. Any other specific conversations 6 that you can think of regarding the connection 7 or perceived connection between use of 8 prescription medication and then heroin or 9 fentanyl use?</p> <p>10 MR. LEDLIE: Object to the form of 11 the question.</p> <p>12 You can answer.</p> <p>13 A. I -- there are other people I know 14 that have transitioned, but I -- there's 15 sources that we've signed up that state they 16 started on prescription medications. I -- I 17 think it's a pretty common narrative in the 18 community.</p> <p>19 Q. When you say sources that you 20 signed up, you're talking about confidential 21 informants?</p> <p>22 A. Yes, yes.</p> <p>23 Q. Is that something that -- is that 24 part of the interview process of a confidential 25 informant?</p>	<p style="text-align: right;">Page 204</p> <p>1 The substance and abuse monitoring 2 network, they actually interview users. My 3 point of contact is a guy named Joe Cummings. 4 They would probably be better served to answer 5 that question.</p> <p>6 MR. BLOCK: All right. A little 7 early, but let's take a break. I may be ready 8 to pass the baton.</p> <p>9 THE WITNESS: Okay. Thank you.</p> <p>10 THE VIDEOGRAPHER: Off the record 11 at 1:35 p.m. 12 (A recess was taken.)</p> <p>13 THE VIDEOGRAPHER: Back on the 14 record at 1:49 p.m.</p> <p>15 EXAMINATION OF MATTHEW PAOLINO 16 BY MR. PULSIPHER:</p> <p>17 Q. Commander Paolino, I am Bryant 18 Pulsipher. I work with Ben representing one of 19 the Defendants in the case.</p> <p>20 I have questions about the drug 21 unit's budget --</p> <p>22 A. Okay.</p> <p>23 Q. -- some of the data that the drug 24 unit uses, databases, and that sort of thing. 25 So the drug unit does have a</p>
<p style="text-align: right;">Page 203</p> <p>1 A. No.</p> <p>2 Q. It's just something they mentioned?</p> <p>3 A. It's something that comes up in 4 conversation. You kind of get to know them. 5 I -- not me personally, but the -- the 6 detectives get to know the guys a little 7 better. Get to know them. They tell them 8 stories.</p> <p>9 Q. If that -- if that fact is 10 mentioned by a confidential informant, is that 11 documented somewhere in connection with the 12 case file?</p> <p>13 A. I doubt a casual conversation would 14 be documented.</p> <p>15 Q. Okay. Are you aware of any -- has 16 the sheriff county drug unit done any -- 17 anything that resembles a -- resembles in any 18 way a scientific study regarding whether 19 there's a connection between use of 20 prescription medication and then use of heroin 21 or fentanyl?</p> <p>22 MR. LEDLIE: Object to the form of 23 the question.</p> <p>24 A. No. There -- there may be better 25 people to ask that question.</p>	<p style="text-align: right;">Page 205</p> <p>1 budget, correct?</p> <p>2 A. We do.</p> <p>3 Q. Do you have responsibilities 4 related to the budget?</p> <p>5 A. I do.</p> <p>6 Q. What responsibilities do you have?</p> <p>7 A. The budget is -- it's pretty much 8 set. There are certain items that are -- 9 they're going to be there every year. Like, we 10 know how much our lease is. We know how much 11 the phones cost. So my responsibility is to do 12 line items for those pieces of our budget that 13 we need segregated out.</p> <p>14 Do you understand what I'm saying?</p> <p>15 Q. Yes.</p> <p>16 A. Like, I know how much our rent is.</p> <p>17 Q. So you mentioned the lease, phones.</p> <p>18 A. Yeah.</p> <p>19 Q. Any other line items that are part 20 of the drug -- drug unit's regular budget?</p> <p>21 A. Lease, phones, the alarm. Trying 22 to run through here. If --</p> <p>23 Q. For example, salaries?</p> <p>24 A. Salary is in the Drug Law 25 Enforcement Fund Grant. That pays for the</p>



<p style="text-align: right;">Page 206</p> <p>1 secretary, Stacey Milkey; the property officer, 2 Carmen; and a portion of my salary. 3 Q. How is the budget created? 4 A. The state or the federal government 5 decides how much money we get. I mean, I -- 6 Q. So speaking instead of about the 7 grants but about all of the drug unit's 8 expenditures, is there a process that you go 9 through to decide what monies will -- money 10 will be spent and on what? 11 A. Just by the needs of the unit. If 12 we have a vehicle that needs replaced. 13 Q. Does anyone have to sign off on the 14 budget? 15 A. The sheriff. He's the subgrantee, 16 and I'm the project director listed on the 17 grants. 18 Can I add one more thing to that? 19 Q. Yes. 20 A. The board of directors has to 21 approve purchases as well. 22 Q. The board of directors of the drug 23 unit? 24 A. Yes. Just want to make sure I get 25 all that out.</p>	<p style="text-align: right;">Page 208</p> <p>1 in there, what I can tell the board is left 2 and -- and ask them for things to purchase or 3 cars to replace. 4 Q. You mentioned a checking account? 5 A. Yes. 6 Q. Is that a specific account for the 7 drug unit? 8 A. Yes. There's two. 9 Q. Two. Do they have different 10 purposes? 11 A. They're both for the -- they're 12 both for the drug unit. The difference is 13 one's a federal account and one's a state 14 account. So we can't put federal money in a 15 state account or state money in a federal 16 account. 17 Q. Have expenses for a particular line 18 item ever outstripped the amount of money that 19 was allocated for that line item? 20 A. No. Generally, we have a pretty 21 good idea of how much something is going to 22 cost. Very rarely do the -- do they end up 23 costing more, if I'm understanding your 24 question. 25 Q. Can you think of any particular</p>
<p style="text-align: right;">Page 207</p> <p>1 Q. Who's primarily responsible for 2 managing expenditures against the money you 3 receive, whether it's from the county, the 4 state, or federal grants? 5 A. Can you ask me that one more time? 6 I'm sorry. 7 Q. Who's responsible for managing the 8 expenditures against the money the drug unit 9 receives, no matter the source? 10 A. If I'm understanding the question, 11 we have financial fiscal officers downtown at 12 53 University Avenue. They pay a majority of 13 the bills. If I'm getting at what you're 14 asking. 15 Q. For example, does anyone keep track 16 of how much money is left to spend for that 17 year -- 18 A. Oh, yes. 19 Q. -- on a particular expense? 20 A. Yes. 21 Q. And who is that? 22 A. Pam Murray or Jennifer Kline. 23 They -- I don't see the checking account ledger 24 until quarterly when the board meets. Do -- I 25 ask for the financial reports, so I know what's</p>	<p style="text-align: right;">Page 209</p> <p>1 time? 2 A. When something -- 3 Q. When something has cost more than 4 you had expected or budgeted for? 5 A. I'm trying to come up with -- with 6 an example for you. I -- I can't come up with 7 one off the top of my head. I'm sorry. 8 Q. How would you handle that situation 9 if it arose? 10 A. I would ask the board for more 11 money, or if it was a small amount of money, I 12 would probably just tell her to pay it. 13 Q. Would you have to reduce the amount 14 of money you spent on some other line item, for 15 example? 16 MR. LEDLIE: Object to the form of 17 the question. 18 You can answer. 19 A. Yeah. I mean, if you're talking 20 about the grant, there's only a set amount of 21 money, so I would have to take it from 22 somewhere else. 23 Q. Do you believe that the drug unit 24 has the resources it needs to fulfill its 25 mission?</p>

<p style="text-align: right;">Page 210</p> <p>1 MR. LEDLIE: Object to the form of</p> <p>2 the question.</p> <p>3 A. If what you're saying, is there</p> <p>4 room for improvement, I would say there's</p> <p>5 always room for improvement.</p> <p>6 Q. Is there room for improvement in</p> <p>7 terms of a larger budget?</p> <p>8 A. I think manpower is always an</p> <p>9 issue, so that would entail a budget, so I</p> <p>10 guess my answer would be yes.</p> <p>11 Q. Are there other specific areas you</p> <p>12 think could be increased or expanded?</p> <p>13 A. I mean, you're asking a question --</p> <p>14 I'd like to expand them all. I mean, I would</p> <p>15 love to have more people and -- so I don't know</p> <p>16 how to answer that.</p> <p>17 Q. So --</p> <p>18 A. I -- I'm sorry. I just think</p> <p>19 there's room -- there's always room for more</p> <p>20 staff on a drug unit. And they're -- staff is</p> <p>21 expensive. It's an expensive part of the --</p> <p>22 Q. So staff is the first thing that</p> <p>23 comes to mind?</p> <p>24 A. It's probably the first thing that</p> <p>25 comes to my mind.</p>	<p style="text-align: right;">Page 212</p> <p>1 Q. What's the other?</p> <p>2 A. A state grant.</p> <p>3 Q. Does that have a particular name?</p> <p>4 A. Drug Law Enforcement Fund. DLEF is</p> <p>5 what we call it.</p> <p>6 Q. How does that compare in size to</p> <p>7 the federal grant?</p> <p>8 A. It's much larger.</p> <p>9 Q. How much larger?</p> <p>10 A. You know, these grants have a cash</p> <p>11 match, so the state grant will be \$250,000, and</p> <p>12 you have to cash match 25 percent.</p> <p>13 Q. When you say "you," what do you</p> <p>14 mean?</p> <p>15 A. I'm sorry. The sheriff's office.</p> <p>16 The drug unit.</p> <p>17 Q. So if I understand you correctly, a</p> <p>18 portion of the grant is paid from a federal or</p> <p>19 a state source and a portion is paid from the</p> <p>20 sheriff's office?</p> <p>21 A. Well, if I can clarify that. The</p> <p>22 sheriff's office uses the money in either the</p> <p>23 federal forfeiture account or the state project</p> <p>24 income account to cash match the grants.</p> <p>25 Do you understand what I mean?</p>
<p style="text-align: right;">Page 211</p> <p>1 Q. And that's probably where you would</p> <p>2 spend money -- additional money if you received</p> <p>3 it?</p> <p>4 MR. LEDLIE: Object to the form.</p> <p>5 You can answer.</p> <p>6 A. Maybe.</p> <p>7 Q. During the time that you've had</p> <p>8 responsibility connected to the budget for the</p> <p>9 drug unit, has the budget ever increased or</p> <p>10 decreased, or has it stayed the same?</p> <p>11 A. The Justice -- Edward Byrne Justice</p> <p>12 Assistance Grant has decreased by, I believe,</p> <p>13 almost half. So it used to be around \$150,000,</p> <p>14 and now it's probably 58.</p> <p>15 Q. Do you have any knowledge of the</p> <p>16 size of that grant for the drug unit before you</p> <p>17 joined in 2012?</p> <p>18 MS. RION: Objection.</p> <p>19 A. I do not. Sorry.</p> <p>20 Q. You do not have knowledge?</p> <p>21 A. I -- I don't know how much the</p> <p>22 prior commander was given, no. I don't know.</p> <p>23 Q. You mentioned there are two grants.</p> <p>24 One's the federal grant we just spoke about.</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 213</p> <p>1 Q. What -- can you define, please, the</p> <p>2 two accounts you just mentioned? The first is</p> <p>3 the project in- -- project income?</p> <p>4 A. Project income. Yes.</p> <p>5 Q. What's that?</p> <p>6 A. Project income's the state -- like,</p> <p>7 if you would seize cash from a -- a drug dealer</p> <p>8 and it was a state-run case, or you would seize</p> <p>9 a vehicle and they'd sell it, the proceeds of</p> <p>10 that would go into that account.</p> <p>11 If a federal case, if you have a</p> <p>12 seizure from that, it would go into the federal</p> <p>13 account -- federal forfeiture account.</p> <p>14 Q. Is that the only difference between</p> <p>15 the two accounts?</p> <p>16 MR. LEDLIE: Object to the form of</p> <p>17 the question.</p> <p>18 Q. Is the source of the funds that go</p> <p>19 into the accounts the only difference between</p> <p>20 the two accounts?</p> <p>21 A. As far as I know.</p> <p>22 Q. What's the total amount of money</p> <p>23 that the county has spent on the drug unit</p> <p>24 since you took over? Don't include grant funds</p> <p>25 received from state and federal sources and</p>

<p style="text-align: right;">Page 214</p> <p>1 don't include forfeiture proceeds.</p> <p>2 A. I would need some time to come up</p> <p>3 with that number. I -- I can tell you staff</p> <p>4 members -- just one staff member per year is</p> <p>5 probably, with benefits, around \$90,000, so I</p> <p>6 couldn't begin to do that on the short. You</p> <p>7 know what I'm saying?</p> <p>8 Q. Can you tell me, then, instead, the</p> <p>9 categories of expenses that the county pays?</p> <p>10 A. The county -- the county's main</p> <p>11 expenditure is staff. The county does not pay</p> <p>12 for the lease, the phones, or any of that other</p> <p>13 things -- any of the other stuff.</p> <p>14 Q. So the county pays for the salary</p> <p>15 of the drug unit staff to the extent those</p> <p>16 salaries are not covered by the grants and</p> <p>17 forfeitures, or the entities, the home</p> <p>18 entities, for the detectives or police officers</p> <p>19 assigned to the drug unit.</p> <p>20 A. Yes.</p> <p>21 Q. So aside from salaries and</p> <p>22 benefits, are you aware of any other categories</p> <p>23 of expenditures that the county pays in</p> <p>24 connection with the drug unit?</p> <p>25 A. Not that I'm aware of.</p>	<p style="text-align: right;">Page 216</p> <p>1 particular investigations?</p> <p>2 A. They would focus on all drug</p> <p>3 investigations.</p> <p>4 Q. You would not staff them onto any</p> <p>5 particular drug investigations or geographical</p> <p>6 areas, for example?</p> <p>7 A. Well, they would be in Summit</p> <p>8 County.</p> <p>9 Q. Of course.</p> <p>10 A. They better be in Summit County.</p> <p>11 Q. Has there ever been a time when the</p> <p>12 drug unit's budget was particularly tight?</p> <p>13 MR. LEDLIE: Object to the form of</p> <p>14 the question.</p> <p>15 A. I'm remembering a time when there</p> <p>16 was very little money in one of the accounts.</p> <p>17 It was when I first started. I remember there</p> <p>18 was talk about there's no money in the account.</p> <p>19 But other than that, I don't really</p> <p>20 recall.</p> <p>21 Q. Do you recall the reason the</p> <p>22 account had little money in it?</p> <p>23 A. It was expenses. It was matching</p> <p>24 grants and just expenses. They really didn't</p> <p>25 go into detail.</p>
<p style="text-align: right;">Page 215</p> <p>1 Q. So it's fair to say, then, that all</p> <p>2 of the expenditures, aside from salaries and</p> <p>3 benefits, are paid from other sources.</p> <p>4 MR. LEDLIE: Object to the form of</p> <p>5 the question.</p> <p>6 A. The only other thing I can think of</p> <p>7 is -- I don't even know how they pay it, but</p> <p>8 the vehicle insurance, I know that's paid for</p> <p>9 by the county. But, no, I -- I don't know.</p> <p>10 Q. Can you tell me which people in the</p> <p>11 drug unit are not covered by grants or</p> <p>12 forfeitures?</p> <p>13 A. Lori Baker-Stella, Robert Scalise,</p> <p>14 Ryan Knight, Jimmy Fields.</p> <p>15 Q. What type of additional manpower</p> <p>16 would you want if you could receive it?</p> <p>17 A. When you say "what type," are you</p> <p>18 asking me number of bodies, or are you asking</p> <p>19 me job function? I don't know what you're</p> <p>20 asking.</p> <p>21 Q. Yeah. Start with job function. Is</p> <p>22 there a particular job function you'd like to</p> <p>23 add?</p> <p>24 A. I would like more detectives.</p> <p>25 Q. Would those detectives focus on any</p>	<p style="text-align: right;">Page 217</p> <p>1 Q. You don't recall any particular</p> <p>2 expenses?</p> <p>3 A. No. It was when I first started.</p> <p>4 Sergeant Don Joseph, I remember he was</p> <p>5 complaining that there was a small amount of</p> <p>6 money in that account.</p> <p>7 Q. Do you expect that your predecessor</p> <p>8 would know more about that time?</p> <p>9 A. I would hope so.</p> <p>10 Q. Is there a time when the drug</p> <p>11 unit's budget was particularly good or when you</p> <p>12 had more money than you expected?</p> <p>13 A. Since there's been -- in the task</p> <p>14 force agreement, if the account exceeds a</p> <p>15 dollar figure, the board will decide if they</p> <p>16 want to disburse any money. There's only been</p> <p>17 one time since I've been there that they've</p> <p>18 taken any money for their home agencies. So --</p> <p>19 Q. When was that?</p> <p>20 A. I don't remember. It was -- it --</p> <p>21 it would have had to have been a few years ago</p> <p>22 because I don't recall it happening in the last</p> <p>23 couple years, and it's only happened once.</p> <p>24 Q. Was it during -- I'll start over.</p> <p>25 Did the board make that decision in</p>

<p style="text-align: right;">Page 218</p> <p>1 a meeting where you were in attendance?</p> <p>2 A. Yes. I can't make that decision.</p> <p>3 Q. How does the board make that</p> <p>4 decision?</p> <p>5 A. There's guidelines that they all</p> <p>6 agree to in the memorandum of understanding.</p> <p>7 Then if an account exceeds a dollar figure,</p> <p>8 they can decide if they want to make any</p> <p>9 disbursement.</p> <p>10 Q. How are the funds allocated from</p> <p>11 one agency to the next?</p> <p>12 A. How are they paid?</p> <p>13 Q. Correct.</p> <p>14 A. I'd have to ask Pam Murray, but I</p> <p>15 believe she disbursed checks.</p> <p>16 Q. I think my question was different.</p> <p>17 A. Okay.</p> <p>18 Q. I apologize.</p> <p>19 I meant to ask, how is it decided,</p> <p>20 for example, that the University of Akron</p> <p>21 Police Department receives a certain amount as</p> <p>22 compared to the Reminderville Police</p> <p>23 Department?</p> <p>24 A. Well, only full-time agencies that</p> <p>25 have someone on full-time are eligible for a</p>	<p style="text-align: right;">Page 220</p> <p>1 and the confidential buy money. Yes, it's</p> <p>2 possible.</p> <p>3 Q. So those are the two sources you'd</p> <p>4 look to: the amount of overtime, buy money.</p> <p>5 Anything else?</p> <p>6 A. Yeah. If we had to use -- if you</p> <p>7 really wanted a real number, if we had to use a</p> <p>8 SWAT team or if we had to involve other</p> <p>9 agencies, I would look at all that.</p> <p>10 Q. Are there budget line items that</p> <p>11 relate to both non-opioid investigations and</p> <p>12 opioid-related investigations?</p> <p>13 A. If I understand the question, no.</p> <p>14 I mean, one of the line items is vehicles, and</p> <p>15 we need cars to conduct investigations, so I</p> <p>16 really can't break it down like that.</p> <p>17 Q. So is it fair to say, then, that</p> <p>18 there are no particular pieces of equipment or</p> <p>19 staff members who are assigned exclusively to</p> <p>20 opioid investigations?</p> <p>21 MR. LEDLIE: Object to the form of</p> <p>22 the question.</p> <p>23 A. All the staff investigate opioids,</p> <p>24 so I'm confused by your question. I'm sorry.</p> <p>25 Q. So all of the staff and all of the</p>
<p style="text-align: right;">Page 219</p> <p>1 disbursement, per the rules. And full-time is</p> <p>2 considered over 32 hours a week.</p> <p>3 And I think they looked at -- and</p> <p>4 by the way, the sheriff didn't take a</p> <p>5 disbursement that year. I don't think he has</p> <p>6 taken any disbursement since I've been there.</p> <p>7 I think they looked at the total</p> <p>8 excess they had -- whether it's from a large</p> <p>9 seizure, I don't remember -- and they decided</p> <p>10 how much they were willing to take out of the</p> <p>11 account and spend.</p> <p>12 Q. Does the drug unit have any budget</p> <p>13 items that relate exclusively to opioids?</p> <p>14 A. The budget can't be broke down like</p> <p>15 that. I don't -- no, no.</p> <p>16 Q. Is it possible to break the budget</p> <p>17 down to see how much of a particular line item</p> <p>18 is attributable to a drug investigation? A</p> <p>19 particular drug investigation, I mean?</p> <p>20 MR. LEDLIE: Object to the form of</p> <p>21 the question.</p> <p>22 You can answer.</p> <p>23 A. Is it possible to calculate, you</p> <p>24 know, man hours spent on a certain</p> <p>25 investigation? Sure. Calculate the overtime</p>	<p style="text-align: right;">Page 221</p> <p>1 equipment have, at one time or another, been</p> <p>2 used to investigate opioids?</p> <p>3 A. I would say that's pretty fair.</p> <p>4 Q. But it's not true that all of the</p> <p>5 staff and all of the equipment are used</p> <p>6 exclusively for opioids. In other words, there</p> <p>7 are many other types of drugs investigated and</p> <p>8 seized, et cetera.</p> <p>9 A. Yes.</p> <p>10 Q. Have you or anyone else in the drug</p> <p>11 unit ever attempted to figure out how much of</p> <p>12 the drug unit's overtime expenses were</p> <p>13 attributable specifically to prescription</p> <p>14 opioids?</p> <p>15 A. No.</p> <p>16 Q. Is that possible to do?</p> <p>17 MR. LEDLIE: Object to the form of</p> <p>18 the question.</p> <p>19 A. I would say it's possible.</p> <p>20 Q. How would you do it?</p> <p>21 A. We don't -- the problem is we spend</p> <p>22 most of our time on the heroin and fentanyl,</p> <p>23 and we have people assigned to just handle</p> <p>24 opioid, the prescription medication</p> <p>25 investigations.</p>

<p style="text-align: right;">Page 222</p> <p>1 Q. Have you ever done that particular 2 exercise for any other drug or budget category? 3 For example, methamphetamine investigations? 4 A. Have I calculated the -- the annual 5 cost? No. 6 Q. Has the drug unit ever incurred any 7 personnel-related costs for opioids, such as 8 medical insurance reimbursements or lost 9 productivity for employees who had been 10 prescribed opioids? 11 A. Not that I'm aware of. 12 Q. If you were to attempt to determine 13 what percent of the drug unit's expenditures 14 were attributable to investigations targeting 15 prescription opioid trafficking, how would you 16 do it? 17 MR. LEDLIE: Object to the form of 18 the question. 19 If you can answer that without 20 guessing or speculating, go ahead. 21 A. I wouldn't know how. These are 22 tough questions. I don't know. 23 Q. Would you consult a particular 24 database to find whether a particular expense 25 was attributable to a prescription opioid</p>	<p style="text-align: right;">Page 224</p> <p>1 Q. Are they restricted to a particular 2 time period? For example, before the drug unit 3 switched to computer files? 4 A. Well, I think you're 5 misunderstanding. There was a hard file and 6 the electronic file. We didn't -- didn't get 7 rid of paper files to switch to a computer 8 file. Do you know what I'm saying? 9 Q. So the paper files and the 10 electronic files both covered the same time 11 period, potentially? 12 A. Well, there was a time, before me, 13 like, I think they went all the way back to the 14 '90s, I don't know what the heck they did. I 15 think they were all paper, but I'm not sure. 16 Q. Is there any difference in the 17 subject matter reported in the paper files 18 versus the electronic files? 19 A. I don't believe so. There may be 20 photos in the electronic files that may or may 21 not have been printed out for a paper file. 22 Not 100 percent sure. The idea was to save 23 some paper, so I don't -- I don't know. 24 Q. So you mentioned computers. Do 25 members of the drug unit have computers?</p>
<p style="text-align: right;">Page 223</p> <p>1 investigation? 2 A. I guess we could look at case 3 files. 4 Q. Where are the case files kept? 5 A. On the drug unit computers. 6 Q. It's probably a good transition 7 to -- 8 A. Okay. 9 Q. -- the document questions. 10 A. Good. 11 Q. So does the drug unit have any 12 physical case files, any paper files? 13 A. We do. 14 Q. Where are those kept? 15 A. In the office, in the filing 16 cabinets. 17 Q. How many? 18 A. Oh, my gosh. I know that attorneys 19 collected everything, so they could probably 20 answer that one. Boxes and boxes. 21 Q. Do those -- 22 A. I -- 23 Q. Go ahead. 24 A. I think it was over a thousand case 25 files, if I remember correctly.</p>	<p style="text-align: right;">Page 225</p> <p>1 A. They -- they all have desktop 2 computers, yes. 3 Q. Does the drug unit keep a network 4 drive? 5 A. So you're getting into stuff that 6 I'm not sure about. 7 Now, I don't know if the physical 8 hard drives, it's linked to a network that goes 9 downtown or if it's -- I'm not sure. It's kind 10 of voodoo to me. 11 Q. Is there a drive or a -- a location 12 you're aware of where electronic files are 13 kept? 14 MR. LEDLIE: Object to the form of 15 the question. 16 A. I know each computer has a hard 17 drive, but there's a master file is -- there's 18 a master drive, and I don't know exactly where 19 that drive is at, physically located. 20 Q. Can all members of the drug unit 21 access those files on the master drive? 22 A. Yes, yes. 23 Q. All the paper files are in the drug 24 unit's offices? 25 A. I believe so, yeah.</p>



<p style="text-align: right;">Page 226</p> <p>1 Q. Do members of the drug units have 2 phones? 3 A. They do. 4 Q. Smart phones? 5 A. Desk phones and smart phones, yes. 6 Q. Do members of the drug unit use 7 their phones for investigation purposes? 8 A. Yes. 9 MR. LEDLIE: Object to the form of 10 the question. 11 THE WITNESS: I'm sorry. 12 MR. LEDLIE: It's okay. 13 A. Yes. 14 Q. Do you know how they use their 15 phones for investigations? 16 A. They make phone calls. They 17 access -- I know some of them access databases 18 like LexisNexis. 19 Q. Using their phones? 20 A. Yeah. 21 Q. Do members of the drug unit send 22 text messages about investigations? 23 A. I'm sure they do. 24 Q. Any other electronic devices, 25 tablets, that sort of thing?</p>	<p style="text-align: right;">Page 228</p> <p>1 speculation. 2 A. I don't know. 3 Q. How old are the drug unit's oldest 4 files? 5 A. I would be guessing. 6 Q. Older than the year 2000? 7 A. I -- I kind of remember Carmen 8 saying they went back to 1999, but I'm not 100 9 percent. I don't know. It was way -- many 10 years before my time. 11 Q. Does the drug unit have a policy 12 about when it deletes or destroys information? 13 A. They do, but I -- I don't think 14 they get rid of anything over there. I've 15 never called for anything to be destroyed. 16 Q. Is the policy written? 17 A. A lot -- yeah, a lot of -- yes. A 18 lot of cases stay open for many years. 19 Q. So as far as you know, no files 20 have ever been destroyed or deleted? 21 A. That I know of, sure. 22 Q. You mentioned the EPIC, El Paso 23 Information Center, database before? 24 A. Yeah. 25 Q. Can you please describe how members</p>
<p style="text-align: right;">Page 227</p> <p>1 A. There are a couple laptops that are 2 used for monitoring covert equipment. 3 They're -- they're not really used for, like, 4 communicating back and forth. But there are 5 laptops there. 6 Q. Did you send information from all 7 these sources to the county's attorneys in this 8 case? 9 A. I guess I'm not understanding. I'm 10 sorry. 11 Q. For example, drug unit members' 12 phones? 13 A. Yeah. 14 Q. Did the county's attorneys look 15 through the phones to determine if any relevant 16 material should be disclosed in this case? 17 MR. LEDLIE: Object -- 18 MS. RION: Objection. 19 MR. LEDLIE: -- to the form of the 20 question. It calls for speculation. 21 A. Yeah, I don't know. Sorry. 22 Q. Do you know whether any members of 23 the drug unit gave their phones to the county's 24 attorneys to inspect? 25 MS. RION: Objection. Calls for</p>	<p style="text-align: right;">Page 229</p> <p>1 of the drug unit use that database? 2 A. Sure. They -- for us, they log on 3 like you would any other website. They log on, 4 and -- and they fill out a -- it's kind of like 5 a stat sheet, but it's a -- they fill out the 6 drugs they seized, the number of people 7 arrested, any other seizures or -- or money 8 seized. They just fill out basic case 9 information on there, generic case information, 10 for tallying the stats at the end of the 11 quarter. 12 Q. And for how long have members of 13 the drug unit used that system? 14 A. That's only been a few years, that 15 I can remember. 16 Q. Do you know how members of the drug 17 unit kept track of that sort of information 18 before they used the EPIC system? 19 A. We have electronic forms called 20 action response on the computer, action 21 response forms. They filled them out that way. 22 And before me, I'd be speculating, 23 but I did hear they used to do it on paper. 24 Q. The action -- sorry, action 25 response forms?</p>

<p style="text-align: right;">Page 230</p> <p>1 A. Yeah.</p> <p>2 Q. Is that a Word document or</p> <p>3 something else?</p> <p>4 A. It's an Excel -- Excel format.</p> <p>5 Q. Is it one spreadsheet for each</p> <p>6 member of the drug unit, or how are the</p> <p>7 spreadsheets divided?</p> <p>8 A. Is it one spreadsheet? They all</p> <p>9 have access to this -- to a spreadsheet to</p> <p>10 input their data. And I -- so I guess I'm</p> <p>11 unsure of the question.</p> <p>12 They -- they don't each have</p> <p>13 individual access, like this is your logon,</p> <p>14 this is your logon. They all can just access</p> <p>15 the database and input their data, and it saves</p> <p>16 it.</p> <p>17 Q. So there's one spreadsheet for</p> <p>18 everyone?</p> <p>19 A. Okay. Yes.</p> <p>20 Q. Are there any other databases the</p> <p>21 drug unit uses?</p> <p>22 MR. LEDLIE: Object to the form of</p> <p>23 the question.</p> <p>24 A. When you say "databases," are you</p> <p>25 talking about for stat collection or -- or</p>	<p style="text-align: right;">Page 232</p> <p>1 Q. Is it an Internet database?</p> <p>2 A. It is.</p> <p>3 Q. So you log on with credentials and</p> <p>4 record information?</p> <p>5 A. Yes.</p> <p>6 Q. Any other places the drug unit</p> <p>7 records information about its investigations?</p> <p>8 A. I can't think of any.</p> <p>9 Q. Do you keep records of training?</p> <p>10 A. We do.</p> <p>11 Q. Where?</p> <p>12 A. In the offices, there's a file</p> <p>13 cabinet with the detectives' names on it. Kept</p> <p>14 in there.</p> <p>15 Q. Are there forms kept in those</p> <p>16 files?</p> <p>17 A. Forms?</p> <p>18 Q. Is there a particular type of form</p> <p>19 where a training is recorded?</p> <p>20 A. No.</p> <p>21 Q. What kind of paperwork is stored in</p> <p>22 that file, then?</p> <p>23 A. Like a certificate.</p> <p>24 Q. I see.</p> <p>25 A. Or travel forms or something like</p>
<p style="text-align: right;">Page 231</p> <p>1 for -- I guess it's so broad, I just can't</p> <p>2 narrow down what you're asking me. I'm sorry.</p> <p>3 Q. Where does the drug unit record</p> <p>4 information about its activities?</p> <p>5 A. They use the case files, the</p> <p>6 electronic case files on the narcotics drive.</p> <p>7 They have access to a program called Case</p> <p>8 Explorer. And that's really -- that's through</p> <p>9 HIDTA.</p> <p>10 And that's a de-confliction. We</p> <p>11 use that as a de-confliction tool. Like, if</p> <p>12 you're looking at this guy on this date and</p> <p>13 this time and so am I, it will tell you -- it</p> <p>14 will alert you, "Hey, Matt's looking at this</p> <p>15 guy, too," so you don't end up in a dangerous</p> <p>16 situation with a bunch of undercover guys with</p> <p>17 guns.</p> <p>18 Q. So is that shared with multiple</p> <p>19 task forces?</p> <p>20 A. Yes.</p> <p>21 Q. Who maintains that database?</p> <p>22 A. HIDTA.</p> <p>23 Q. That's the same thing as the Case</p> <p>24 Explorer database?</p> <p>25 A. Yeah, yeah.</p>	<p style="text-align: right;">Page 233</p> <p>1 that. Keep it all in there.</p> <p>2 Q. Anything to show how much money was</p> <p>3 reimbursed, if any, for training?</p> <p>4 A. I mean, you could check the</p> <p>5 financial records to see, like, the checking</p> <p>6 account. Because that's something -- that's</p> <p>7 something that the drug unit pays for.</p> <p>8 Q. How is the Ohio HIDTA financed?</p> <p>9 A. I believe congress enacted an act</p> <p>10 in the '80s, and the president writes it in</p> <p>11 his -- in the budget.</p> <p>12 Q. So as far as you know, no local</p> <p>13 money is spent on that?</p> <p>14 A. I -- I don't know how the -- other</p> <p>15 than federal money, I don't know.</p> <p>16 Q. So we've spoken about the Byrne or</p> <p>17 JAG grant?</p> <p>18 A. Yeah.</p> <p>19 Q. Is that the federal grant?</p> <p>20 A. It is.</p> <p>21 Q. And the DLEF grant?</p> <p>22 A. Yes.</p> <p>23 Q. That's the state grant?</p> <p>24 A. Yeah. That's the Drug Law</p> <p>25 Enforcement Fund.</p>

<p style="text-align: right;">Page 234</p> <p>1 Q. And in recent years you said the 2 federal grant has been smaller? 3 A. It has. 4 Q. Has the DLEF grant ever changed its 5 size? 6 A. No, but they did put out an e-mail 7 that it's going to be reduced. 8 Q. Who's "they"? 9 A. Department of Public Safety. 10 Q. The State of Ohio? 11 A. Yeah. They -- 12 Q. When? 13 A. This was real recent. This was in 14 the last few days. 15 Q. Do you know when it would be 16 reduced? 17 A. They said this upcoming year. The 18 grant is -- the DLEF grant is written in 19 December, like right now. And they said be 20 prepared because it's going to be reduced. 21 Q. What's the approximate size of the 22 annual amount of that grant? 23 A. For everyone? 24 Q. For the drug unit. 25 A. Just what we get?</p>	<p style="text-align: right;">Page 236</p> <p>1 Q. So let's start with the federal 2 grant. What restrictions apply to that grant? 3 A. You know, the -- the guidelines 4 are -- are about the size of a phone book, so 5 you just have to know you can't spend it on 6 luxury items, on food. You know, it has to be 7 used for drug investigations. 8 Q. What are the largest uses of the 9 federal grant money? 10 A. In our grant? 11 Q. Correct. 12 A. It's -- pays part of my salary. 13 Q. Anything else? 14 A. I think it took all that. 15 Q. And the state grant, are there 16 restrictions on how that money is used? 17 A. Yeah. Oh, yeah. Yeah. 18 Q. What restrictions? 19 A. The same thing. You can't buy 20 luxury items or buy food, beverages. It just 21 has to be used for drug investigations. 22 Q. Are either of these grants or any 23 grants related expressly to opioids? 24 MR. LEDLIE: Object to the form of 25 the question.</p>
<p style="text-align: right;">Page 235</p> <p>1 Q. Right. 2 A. 250,000, and then \$83,333.33 cash 3 match. 4 Q. From local sources? 5 A. From the drug unit checking 6 account. 7 Q. Are there any other grants the drug 8 unit has received? 9 A. JAG grant. I can't think of one. 10 Q. Anything related to the National 11 Heroin Initiative? 12 A. The -- is that -- are you talking 13 about OCDETF money? 14 Q. For example, yes. 15 A. Yes, they did get some OCDETF 16 money. 17 Q. Do you know how much? 18 A. No, I -- I don't remember. The 19 last -- there was two applications, and the 20 last application, it all went to the City of 21 Akron. We didn't get any. Prior to that I'm 22 not sure. That was written by the DEA. 23 Q. Are any of the grants we've 24 discussed restricted to specific uses? 25 A. Yes. They all are.</p>	<p style="text-align: right;">Page 237</p> <p>1 A. I guess I don't understand that. 2 Q. What's your annual salary? 3 A. My base salary is 9- -- like, 98. 4 Q. Has it changed over time? 5 A. Well, yeah. Every year we get a 6 little bit of a raise. 7 Q. Has there been a large increase at 8 any time since you've joined the drug unit, or 9 decrease? 10 A. It's increased. 11 Q. Have you considered applying, but 12 did not apply, for any grants? 13 MR. LEDLIE: Object to the form. 14 That's okay. You can answer. 15 A. I probably at some point considered 16 applying for a grant. 17 Q. Can you recall any specific grants? 18 A. No. 19 Q. Any you applied for but didn't 20 receive? 21 A. I don't know if it's considered a 22 grant, but there was some supplemental funding 23 years ago. I applied for -- for new phone 24 monitoring equipment through HIDTA, and it was 25 declined.</p>

<p style="text-align: right;">Page 238</p> <p>1 Q. Do you know why?</p> <p>2 A. No. They didn't give me a response</p> <p>3 why they didn't.</p> <p>4 Q. Do you know the amount that the</p> <p>5 grant would have been or that you asked for?</p> <p>6 A. It's probably -- I know the</p> <p>7 equipment was about \$130,000.</p> <p>8 - - - - -</p> <p>9 (Thereupon, Deposition Exhibit 3,</p> <p>10 Document Titled "Quarterly Subgrant</p> <p>11 Report 2014," SUMMIT_001007576 to</p> <p>12 001007579, was marked for purposes</p> <p>13 of identification.)</p> <p>14 - - - - -</p> <p>15 Q. The court reporter has just handed</p> <p>16 you what's marked as Exhibit 3. Do you</p> <p>17 recognize this document?</p> <p>18 A. I recognize it. I don't complete</p> <p>19 this document, though.</p> <p>20 Q. Who completes it?</p> <p>21 A. Pam Murray. She handles all the</p> <p>22 financial -- quarterly financial reports for</p> <p>23 the grants.</p> <p>24 Q. Do you the know purpose of this</p> <p>25 form?</p>	<p style="text-align: right;">Page 240</p> <p>1 Q. How has it worked in the past?</p> <p>2 A. In the past they would -- there was</p> <p>3 a -- if the account reached a certain amount of</p> <p>4 money, the board would decide if they were</p> <p>5 going to disburse proceeds.</p> <p>6 Q. And there was one instance we</p> <p>7 discussed before where that occurred?</p> <p>8 A. That I can remember.</p> <p>9 Q. You can't remember any others?</p> <p>10 A. I know they get money for --</p> <p>11 they've been written money for overtime</p> <p>12 expenses, but that's -- you know, that was a --</p> <p>13 it wasn't a disbursement, I wouldn't call it.</p> <p>14 Q. If money is not normally disbursed,</p> <p>15 what is it used for?</p> <p>16 A. Pays the bills.</p> <p>17 Q. What kind of bills?</p> <p>18 A. Matching grants, vehicle repairs,</p> <p>19 upgrading surveillance equipment.</p> <p>20 Q. Is there any use you cannot -- I'll</p> <p>21 start over.</p> <p>22 Are there any restrictions on the</p> <p>23 way you're -- you use forfeiture proceeds?</p> <p>24 A. Well, sure.</p> <p>25 Q. What kind of restrictions?</p>
<p style="text-align: right;">Page 239</p> <p>1 A. It looks like an expenditure sheet.</p> <p>2 Q. You don't know anything more about</p> <p>3 why this form is prepared?</p> <p>4 A. I imagine they'd like to know where</p> <p>5 the money is going.</p> <p>6 Q. What is your role in preparing</p> <p>7 these reports, if any?</p> <p>8 A. I don't prepare this report.</p> <p>9 Q. And that's Pam Murray who prepares</p> <p>10 it?</p> <p>11 A. Pam Murray, yeah.</p> <p>12 Q. Okay. So you mentioned forfeiture</p> <p>13 proceeds before?</p> <p>14 A. I did.</p> <p>15 Q. How is it decided which</p> <p>16 contributing agencies receive how much of a</p> <p>17 particular forfeiture proceed?</p> <p>18 Is that the process we discussed</p> <p>19 before?</p> <p>20 A. What -- are you talking about for</p> <p>21 disbursements?</p> <p>22 Q. Yes.</p> <p>23 A. Well, the -- you know, the rules</p> <p>24 just changed this year, so I don't know how</p> <p>25 it's going to work.</p>	<p style="text-align: right;">Page 241</p> <p>1 A. The same thing. You can't -- it</p> <p>2 has to be used for drug investigations.</p> <p>3 Q. Do you know the total value of</p> <p>4 forfeited assets received by the drug unit</p> <p>5 since you started?</p> <p>6 A. Since I started? You mean cash</p> <p>7 received?</p> <p>8 Q. Forfeited funds.</p> <p>9 A. No. We could probably find that</p> <p>10 out, though.</p> <p>11 Q. Do you know how much it was for</p> <p>12 this last year?</p> <p>13 A. No.</p> <p>14 Q. If you could look back to</p> <p>15 Exhibit 1, the sheriff's annual report.</p> <p>16 A. Sure.</p> <p>17 Q. And look at page 36. There's a</p> <p>18 table on the right-hand side, "2017 Criminal</p> <p>19 Forfeitures"; do you see that?</p> <p>20 A. Uh-huh.</p> <p>21 Q. And then values next to the</p> <p>22 categories Vehicles, Currency, Electronics, and</p> <p>23 Other?</p> <p>24 A. Yes.</p> <p>25 Q. Those are the amounts forfeited in</p>

<p style="text-align: right;">Page 242</p> <p>1 2017?</p> <p>2 A. I believe.</p> <p>3 Q. Do you know whether the amounts in</p> <p>4 other years were different from those amounts?</p> <p>5 Significantly different?</p> <p>6 MR. LEDLIE: Object to the form of</p> <p>7 the question.</p> <p>8 A. I would have to look back through</p> <p>9 prior years to be able to give an honest</p> <p>10 answer.</p> <p>11 Q. So the -- the dollar amounts in the</p> <p>12 right-hand column under "Total Value," how much</p> <p>13 of those amounts was paid into those two</p> <p>14 accounts we discussed: the forfeiture account</p> <p>15 and the income -- project income accounts?</p> <p>16 A. I wouldn't know, without looking at</p> <p>17 the financial report, looking at the checking</p> <p>18 account ledger. But the drug unit may not have</p> <p>19 received this total sum if other agencies were</p> <p>20 involved. Do you understand?</p> <p>21 Q. So do you mean that this is the</p> <p>22 amount forfeited but not necessarily the amount</p> <p>23 paid into the two accounts?</p> <p>24 A. That's correct.</p> <p>25 Q. Other agencies might have received</p>	<p style="text-align: right;">Page 244</p> <p>1 their cases to be public record.</p> <p>2 Q. So this case is --</p> <p>3 A. It could be pending.</p> <p>4 Q. It could be pending, this --</p> <p>5 A. Yeah.</p> <p>6 Q. -- case you're remembering in</p> <p>7 Raleigh, North Carolina?</p> <p>8 A. Yeah. But I'm just trying to give</p> <p>9 you an example of why another --</p> <p>10 Q. Understood.</p> <p>11 A. -- HIDTA would get money.</p> <p>12 Q. So we discussed this before, but</p> <p>13 the drug unit is multi-jurisdictional, correct?</p> <p>14 A. Uh-huh.</p> <p>15 Q. That means that officers in the</p> <p>16 drug unit come from several agencies?</p> <p>17 A. That's correct.</p> <p>18 Q. And Summit County does not pay the</p> <p>19 salaries or benefits for the officers from</p> <p>20 other agencies?</p> <p>21 A. That's correct.</p> <p>22 Q. And whatever -- do those agencies</p> <p>23 bring equipment or resources to the drug unit?</p> <p>24 A. Not really.</p> <p>25 Q. Not really. Are there exceptions?</p>
<p style="text-align: right;">Page 243</p> <p>1 some of those proceeds?</p> <p>2 A. Yeah, other agencies not even</p> <p>3 related to the drug unit.</p> <p>4 Q. Can you give some examples of what</p> <p>5 you mean?</p> <p>6 A. Sure. Getting into DEA.</p> <p>7 We did a -- an investigation with a</p> <p>8 Raleigh task force --</p> <p>9 Q. Sorry. Raleigh?</p> <p>10 A. Raleigh.</p> <p>11 Q. Raleigh, North Carolina?</p> <p>12 A. Yeah. And they -- they would get a</p> <p>13 portion of the seizure, as well. It would be</p> <p>14 counted in our statistics.</p> <p>15 Q. Do you recall what kind of</p> <p>16 investigation that was?</p> <p>17 A. Yes.</p> <p>18 Q. What kind?</p> <p>19 A. It was -- it was money to --</p> <p>20 brought up to pay for drugs.</p> <p>21 This is a DEA case, so I'm</p> <p>22 really -- I'm getting kind of uncomfortable</p> <p>23 talking about it.</p> <p>24 Q. Why is that?</p> <p>25 A. Well, I don't think they would like</p>	<p style="text-align: right;">Page 245</p> <p>1 A. I'm just trying to think of</p> <p>2 something. If, like, maybe someone came with a</p> <p>3 cell phone one time, but -- where we didn't</p> <p>4 have to pay for that, but noth- -- nothing</p> <p>5 major that --</p> <p>6 Q. No vehicles?</p> <p>7 A. I think we supply vehicles to</p> <p>8 everybody.</p> <p>9 Q. Any surveillance equipment?</p> <p>10 A. Not that I'm remembering.</p> <p>11 Q. Weapons?</p> <p>12 A. Well, they all bring their own</p> <p>13 weapon.</p> <p>14 Q. Ammunition?</p> <p>15 A. No. We pay for that.</p> <p>16 Q. The drug unit pays for the</p> <p>17 ammunition?</p> <p>18 A. Yes. Well, we may not pay for the</p> <p>19 ammunition that's in their gun, but we train</p> <p>20 monthly and pay for that ammunition.</p> <p>21 Q. Understood.</p> <p>22 Has the drug unit made any</p> <p>23 purchases that relate specifically to</p> <p>24 investigations of opioid trafficking?</p> <p>25 MR. LEDLIE: Object to the form of</p>



<p style="text-align: right;">Page 246</p> <p>1 the question.</p> <p>2 A. I don't know specifically how to</p> <p>3 answer this question. All the equipment is</p> <p>4 used for all the investigations.</p> <p>5 Q. There's no laboratory equipment,</p> <p>6 for example, that is used only to test opioids?</p> <p>7 A. That we have?</p> <p>8 Q. Correct.</p> <p>9 A. I mean, there's presumptive test</p> <p>10 kits.</p> <p>11 Q. What's that?</p> <p>12 A. You know, they're called NIK kits.</p> <p>13 You put a sample of a drug in it, break the</p> <p>14 little vials, and --</p> <p>15 Q. And that works for only a</p> <p>16 particular type of drug?</p> <p>17 A. Well, there's one for every --</p> <p>18 there's one for cocaine, MDMA, fentanyl,</p> <p>19 heroin.</p> <p>20 Q. How has the staffing in the drug</p> <p>21 unit changed over the years, if at all?</p> <p>22 A. It's -- it's grown.</p> <p>23 Q. So when you started, what was the</p> <p>24 approximate size of the drug unit?</p> <p>25 A. I mean, we probably have -- I guess</p>	<p style="text-align: right;">Page 248</p> <p>1 we had to get more. It had a two-year shelf</p> <p>2 life.</p> <p>3 Q. Do deputies or officers prepare</p> <p>4 reports for when they use Narcan, naloxone?</p> <p>5 A. Yes. There is a use sheet.</p> <p>6 Q. Sorry?</p> <p>7 A. There is a use sheet.</p> <p>8 Q. Use sheet?</p> <p>9 A. Yeah, they're supposed to fill out.</p> <p>10 Q. Is it a digital file or a paper</p> <p>11 file?</p> <p>12 A. It's a paper file.</p> <p>13 Q. Do you know how many times officers</p> <p>14 in the drug unit used Narcan this last year?</p> <p>15 A. In the past year? I think Sergeant</p> <p>16 Hunt was the only one that's had to use it, and</p> <p>17 I think he used it one time.</p> <p>18 Q. Do you recall, going back further</p> <p>19 than a year, how many officers have used</p> <p>20 Narcan?</p> <p>21 A. I don't know if any of them had to</p> <p>22 use it.</p> <p>23 Q. Just Pat Hunt?</p> <p>24 A. Yeah.</p> <p>25 Q. Does the drug unit conduct any</p>
<p style="text-align: right;">Page 247</p> <p>1 we probably have maybe four more guys than we</p> <p>2 did, maybe five.</p> <p>3 Q. It hasn't decreased; only</p> <p>4 increased?</p> <p>5 A. I'd say it's increased, sure. It</p> <p>6 has -- I mean, there's agencies have come and</p> <p>7 they've gone and new ones have joined, so --</p> <p>8 Q. Understood.</p> <p>9 Has the drug unit purchased or</p> <p>10 spent any money on Narcan or naloxone doses?</p> <p>11 A. We carry it. It was given to us by</p> <p>12 Summit County Public Health.</p> <p>13 Q. Have you spent any money training</p> <p>14 about how to use those doses?</p> <p>15 A. We sent Sergeant Hunt and now Jerry</p> <p>16 Angerstein to Summit County Public Health to</p> <p>17 get certified to train the officers on Narcan.</p> <p>18 So other than their daily wages, no.</p> <p>19 Q. And how long have officers in the</p> <p>20 drug unit received training on Narcan?</p> <p>21 A. It's been a little over two years</p> <p>22 now.</p> <p>23 Q. So it started in 2016?</p> <p>24 A. Right around there. And I only</p> <p>25 know that because the Narcan was expiring, and</p>	<p style="text-align: right;">Page 249</p> <p>1 training related to opioids?</p> <p>2 MR. LEDLIE: Object to the form of</p> <p>3 the question.</p> <p>4 A. I mean, every day we're meeting,</p> <p>5 talking about opioids. I think I --</p> <p>6 Q. Any formal training?</p> <p>7 A. They have been to -- annually, they</p> <p>8 go to NARCO, Ohio NARCO. It's a nonprofit</p> <p>9 organization for collaboration of law</p> <p>10 enforcement around the state, and there's</p> <p>11 training.</p> <p>12 Q. Every year?</p> <p>13 A. Every year.</p> <p>14 Q. And all the drug unit members go to</p> <p>15 that training?</p> <p>16 A. No. Not -- not all of them.</p> <p>17 Q. How many?</p> <p>18 A. But a majority of them.</p> <p>19 Q. A majority?</p> <p>20 A. Yeah. There's a few that don't</p> <p>21 like to go because it's...</p> <p>22 Q. Does the drug unit have any</p> <p>23 involvement in corrections?</p> <p>24 A. Not really.</p> <p>25 Q. Do you ever investigate narcotics</p>

<p style="text-align: right;">Page 250</p> <p>1 events in the jail, for example?</p> <p>2 A. The jail, it would depend. The</p> <p>3 sheriff generally would send a detective from</p> <p>4 the detective bureau.</p> <p>5 Q. Does the drug unit have any</p> <p>6 connection to dispatch services performed by</p> <p>7 the sheriff's office, if any?</p> <p>8 A. What do you mean?</p> <p>9 Q. Does the sheriff's office maintain</p> <p>10 a dispatch service?</p> <p>11 A. Oh, yeah. Yes.</p> <p>12 Q. Does the drug unit have any</p> <p>13 connection to that dispatch service?</p> <p>14 A. I guess I don't understand. When</p> <p>15 you say "connection" --</p> <p>16 Q. Do any members of the drug unit</p> <p>17 administer the dispatch service?</p> <p>18 A. Oh, no. No.</p> <p>19 Q. Do you respond to calls for</p> <p>20 service?</p> <p>21 A. No.</p> <p>22 Q. Have you heard of a QRT or Quick</p> <p>23 Response Team?</p> <p>24 A. Yes.</p> <p>25 Q. Are any members of the drug unit</p>	<p style="text-align: right;">Page 252</p> <p>1 a few meetings?</p> <p>2 A. I've been to a couple, yeah.</p> <p>3 Q. And that Lori Baker-Stella went --</p> <p>4 A. Yeah.</p> <p>5 Q. -- to a few meetings? Any --</p> <p>6 A. The sheriff.</p> <p>7 Q. And the sheriff.</p> <p>8 A. Yeah. And Inspector Chris Rhoades.</p> <p>9 Q. Anyone else in the drug unit?</p> <p>10 A. I believe I made Pat Hunt go a few</p> <p>11 times.</p> <p>12 Q. Have you ever heard of a database</p> <p>13 called ARCOS?</p> <p>14 A. The first time I heard about it was</p> <p>15 when I was flipping through the complaint, so</p> <p>16 no. Before the -- I looked at the complaint,</p> <p>17 no.</p> <p>18 Q. Has the drug unit ever referred to</p> <p>19 ARCOS?</p> <p>20 A. Not that I'm aware of.</p> <p>21 Q. Has the drug unit ever referred to</p> <p>22 OARRS?</p> <p>23 A. Yes.</p> <p>24 Q. And that's in investigation of</p> <p>25 prescription drug trafficking?</p>
<p style="text-align: right;">Page 251</p> <p>1 part of the QRT?</p> <p>2 A. No.</p> <p>3 Q. Are any members of the sheriff's</p> <p>4 office part of the QRT?</p> <p>5 A. Yes.</p> <p>6 Q. Which ones?</p> <p>7 A. Sergeant Mike Walsh. He's in</p> <p>8 charge of DARE. He's a member of the QRT team.</p> <p>9 Q. Just -- just Sergeant Walsh?</p> <p>10 A. That I know of from the sheriff's</p> <p>11 office, yeah. I'm not a part of that.</p> <p>12 Q. Are drug unit members part of any</p> <p>13 task forces --</p> <p>14 MR. LEDLIE: Object to the form.</p> <p>15 Q. -- related to opioids?</p> <p>16 MR. LEDLIE: Object to the form of</p> <p>17 the question.</p> <p>18 A. Again, that's so broad. We have</p> <p>19 Lori Baker-Stella attached to TDS squad.</p> <p>20 Q. Right.</p> <p>21 A. And I -- I don't know what you're</p> <p>22 looking for. I don't know what you're trying</p> <p>23 to ask. I'm sorry.</p> <p>24 Q. So, for example, the Summit County</p> <p>25 Opiate Task Force, you mentioned you've been to</p>	<p style="text-align: right;">Page 253</p> <p>1 A. Potentially.</p> <p>2 Q. Does the drug unit ever use the</p> <p>3 Ohio Law Enforcement Gateway?</p> <p>4 A. Yes.</p> <p>5 Q. How?</p> <p>6 A. Their desktop computers. They log</p> <p>7 on. It's an Internet-based website.</p> <p>8 Q. What do you use that for?</p> <p>9 A. They use it for trying to establish</p> <p>10 someone's identity.</p> <p>11 Q. Do you submit reports -- is it --</p> <p>12 is it referred to as OHLEG?</p> <p>13 A. OHLEG, yeah.</p> <p>14 Q. Does it -- do members of the drug</p> <p>15 unit submit reports to OHLEG?</p> <p>16 A. Not really.</p> <p>17 Q. Not really? Are there some</p> <p>18 exceptions?</p> <p>19 A. Yeah. I mean, if there's -- if a</p> <p>20 child is taken from a home or something like</p> <p>21 that, you have to physically complete a paper</p> <p>22 form. It's called a Rule 6 in Ohio.</p> <p>23 Q. Any reports related to narcotics?</p> <p>24 A. Generally, no.</p> <p>25 Q. Are there exceptions if "generally,</p>

<p style="text-align: right;">Page 254</p> <p>1 no"?</p> <p>2 A. I can't think of any.</p> <p>3 Q. Do the members of the drug unit use</p> <p>4 the Ohio Incident-Based Reporting System?</p> <p>5 A. OIBRS? No. No.</p> <p>6 Q. They don't submit reports to OIBRS?</p> <p>7 A. Oh, I'm sorry. I was getting a</p> <p>8 little confused, all these acronyms.</p> <p>9 The NIBRS reports are when you have</p> <p>10 a Rule -- Rule 6 a child.</p> <p>11 OHLEG, I don't know of any reports</p> <p>12 they would submit to them.</p> <p>13 Q. So your previous answer about that</p> <p>14 report and the child --</p> <p>15 A. Would be for NIBRS.</p> <p>16 Q. Understood.</p> <p>17 Is there a difference between the</p> <p>18 Ohio Incident-Based Reporting System and the</p> <p>19 National Incident-Based Reporting System?</p> <p>20 A. I don't know.</p> <p>21 MR. PULSIPHER: Take a break.</p> <p>22 THE VIDEOGRAPHER: Off the record</p> <p>23 at 2:42 p.m.</p> <p>24 (A recess was taken.)</p> <p>25 THE VIDEOGRAPHER: Back on the</p>	<p style="text-align: right;">Page 256</p> <p>1 Q. Did anyone ask you to provide any</p> <p>2 information from that database for review and</p> <p>3 production in this litigation?</p> <p>4 A. Not that I'm aware of.</p> <p>5 Q. Okay.</p> <p>6 A. I think the DEA maintain that site.</p> <p>7 You'd probably have to get permission from the</p> <p>8 DEA to get into that. I'm not 100 percent sure</p> <p>9 on that.</p> <p>10 Q. Okay. Thank you.</p> <p>11 I'd like to turn you attention back</p> <p>12 to Exhibit 2. If I can ask you to turn to</p> <p>13 the -- the page that has the Bates number</p> <p>14 ending in 8475 at the bottom of it.</p> <p>15 So that's titled "Pharmaceutical</p> <p>16 Diversion Questions," correct?</p> <p>17 A. Yes.</p> <p>18 Q. And this is information that the</p> <p>19 task force would have provided in response to</p> <p>20 certain grants; is that accurate?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And if you turn two pages</p> <p>23 forward to Bates -- page Bates-numbered 8477.</p> <p>24 A. Okay.</p> <p>25 Q. Do you see where it says "Type of</p>
<p style="text-align: right;">Page 255</p> <p>1 record at 2:56 p.m.</p> <p>2 EXAMINATION OF MATTHEW PAOLINO</p> <p>3 BY MR. DAVISON:</p> <p>4 Q. Good afternoon. My name is William</p> <p>5 Davison, and I represent another Defendant in</p> <p>6 this matter. So I appreciate your patience</p> <p>7 and --</p> <p>8 A. No problem.</p> <p>9 Q. -- being with us. I just have a</p> <p>10 few questions --</p> <p>11 A. Okay.</p> <p>12 Q. -- that -- that I'd like to ask</p> <p>13 you.</p> <p>14 So my first question is, are you</p> <p>15 familiar with the EPIC database?</p> <p>16 A. Yes.</p> <p>17 Q. And what is the EPIC database?</p> <p>18 A. It's where we -- El Paso</p> <p>19 Intelligence Center, that's where the</p> <p>20 detectives submit their daily stats to.</p> <p>21 Q. And are you aware of whether that</p> <p>22 information in the database was ever provided</p> <p>23 to your counsel for review and production in</p> <p>24 this litigation?</p> <p>25 A. I don't know.</p>	<p style="text-align: right;">Page 257</p> <p>1 drug (brand name)," in parentheses, and the --</p> <p>2 the chart beneath it?</p> <p>3 A. I do.</p> <p>4 Q. And to the right of that, it says</p> <p>5 "Dosage Unit Seized"; is that accurate?</p> <p>6 A. Yes.</p> <p>7 Q. In the chart?</p> <p>8 When -- when preparing this chart,</p> <p>9 you provide information based on the type of</p> <p>10 drug; is that correct?</p> <p>11 A. Yes.</p> <p>12 Q. Does the task force keep track of</p> <p>13 the manufacturer of any particular drug that is</p> <p>14 seized?</p> <p>15 A. Not that I'm aware of.</p> <p>16 Q. Would the task force keep track of</p> <p>17 the manufacturer of any dosage units diverted?</p> <p>18 A. Not that I'm aware of.</p> <p>19 Q. And is that because it's not</p> <p>20 relevant to your attempts to prosecute people</p> <p>21 who divert prescription medication?</p> <p>22 MR. LEDLIE: Object to the form of</p> <p>23 the question.</p> <p>24 You can answer.</p> <p>25 A. I don't know how it would be</p>

<p style="text-align: right;">Page 258</p> <p>1 helpful, I guess is my answer.</p> <p>2 Q. Is that because in your</p> <p>3 investigation, you're focusing on the</p> <p>4 individual who may be diverting the product?</p> <p>5 MR. LEDLIE: Object to form.</p> <p>6 A. Yes. We're focusing on the -- the</p> <p>7 drug dealer, if that's your question.</p> <p>8 Q. Okay. So the drug dealer rather</p> <p>9 than the manufacturer of the product, correct?</p> <p>10 A. Yes.</p> <p>11 Q. So if someone were to ask the drug</p> <p>12 unit to tell how many pills from a particular</p> <p>13 manufacturer had been diverted in the county,</p> <p>14 that would not be possible for the drug unit to</p> <p>15 tell them, correct?</p> <p>16 A. I don't think I'd have any idea.</p> <p>17 Q. Okay. And that's because you don't</p> <p>18 keep track of that information, correct?</p> <p>19 A. Correct.</p> <p>20 MR. LEDLIE: Object to the form of</p> <p>21 the question.</p> <p>22 Q. Are you familiar with what a</p> <p>23 litigation hold is?</p> <p>24 A. Is that the document -- request to</p> <p>25 hold documents?</p>	<p style="text-align: right;">Page 260</p> <p>1 Q. Okay. Sir, have you ever used a</p> <p>2 prescription opioid?</p> <p>3 A. I have.</p> <p>4 MR. LEDLIE: I'm going to instruct</p> <p>5 the witness not to answer as to any of his</p> <p>6 personal use. It's a privacy issue.</p> <p>7 MR. DAVISON: And -- and what's the</p> <p>8 basis for that?</p> <p>9 MR. LEDLIE: HIPAA.</p> <p>10 MR. DAVISON: Sorry. Just to make</p> <p>11 sure I understand the basis.</p> <p>12 MR. LEDLIE: Health information</p> <p>13 protection. His personal medical usage is not</p> <p>14 relevant and has been the same objection that's</p> <p>15 come up. I understand it hasn't been an issue,</p> <p>16 but.</p> <p>17 MR. DAVISON: Okay. I just wanted</p> <p>18 to make sure that the objection was -- was</p> <p>19 clear on the record, that you're saying it's</p> <p>20 a -- it's a HIPAA issue for his personal,</p> <p>21 whether or not he has used an opioid; not any</p> <p>22 question about the actual prescription, the</p> <p>23 reason, or anything like that. But the mere</p> <p>24 question of yes or no you say is protected by</p> <p>25 HIPAA?</p>
<p style="text-align: right;">Page 259</p> <p>1 Q. Yes. Something that tells you to</p> <p>2 hold on to documents, rather than --</p> <p>3 A. Sure.</p> <p>4 Q. -- destroying anything.</p> <p>5 And did you see one related to this</p> <p>6 litigation?</p> <p>7 A. Yes.</p> <p>8 Q. And when did you receive that?</p> <p>9 A. Gosh, I don't remember exactly when</p> <p>10 it was, but.</p> <p>11 Q. Do you remember, was it this year?</p> <p>12 A. It -- it was this year.</p> <p>13 Q. Okay. Was it in the -- the spring</p> <p>14 of this year, the summer of this year, the fall</p> <p>15 of this year?</p> <p>16 A. I just don't remember. It --</p> <p>17 Q. Okay.</p> <p>18 A. It was a -- I believe an e-mail.</p> <p>19 Q. Okay. So you believe you received</p> <p>20 an e-mail litigation to hold sometime this</p> <p>21 year, correct?</p> <p>22 A. Yeah.</p> <p>23 Q. Okay. And did you follow the</p> <p>24 instructions on that e-mail?</p> <p>25 A. Yeah.</p>	<p style="text-align: right;">Page 261</p> <p>1 MR. LEDLIE: His personal use of an</p> <p>2 opioid, I believe, whether he used or did not</p> <p>3 use an opioid, is protected by HIPAA, yes.</p> <p>4 MR. DAVISON: Okay. Just wanted to</p> <p>5 make sure the record was clear.</p> <p>6 MR. LEDLIE: Sure.</p> <p>7 MR. DAVISON: Thank you.</p> <p>8 MR. LEDLIE: No problem.</p> <p>9 MR. DAVISON: I have nothing</p> <p>10 further at this time. I do believe that one of</p> <p>11 my other cocounsel has a question.</p> <p>12 MR. LEDLIE: Sure.</p> <p>13 MR. DAVISON: Can we go off the</p> <p>14 record?</p> <p>15 THE VIDEOGRAPHER: Off the record</p> <p>16 at 3:02 p.m.</p> <p>17 (Off the record.)</p> <p>18 THE VIDEOGRAPHER: Back on the</p> <p>19 record at 3:03 p.m.</p> <p>20 EXAMINATION OF MATTHEW PAOLINO</p> <p>21 BY MR. BREWER:</p> <p>22 Q. Good afternoon.</p> <p>23 A. Good morning -- afternoon.</p> <p>24 Q. My name is Matt Brewer. I</p> <p>25 represent Walgreens, and I'll ask a few more</p>

<p style="text-align: right;">Page 262</p> <p>1 follow-up questions.</p> <p>2 A. Okay.</p> <p>3 Q. The same rules apply.</p> <p>4 A. Okay.</p> <p>5 Q. I first want to draw your attention</p> <p>6 to Exhibit 2 --</p> <p>7 A. Okay.</p> <p>8 Q. -- which I believe you have in</p> <p>9 front of you, at the page ending in 8475. And</p> <p>10 the title of that page reads "Pharmaceutical</p> <p>11 Diversion Questions."</p> <p>12 Do you see that?</p> <p>13 A. I do.</p> <p>14 Q. Pharmaceutical diversion, does that</p> <p>15 relate to diversion of prescription drugs?</p> <p>16 A. As I understand it, yes.</p> <p>17 Q. And there's that first question</p> <p>18 that I believe you -- you all reviewed earlier</p> <p>19 today that talks about the total number of</p> <p>20 pharmaceutical cases initiated during the</p> <p>21 reporting period, and there's the number "1"</p> <p>22 there. And you see that and you recall</p> <p>23 testifying about that?</p> <p>24 A. I do.</p> <p>25 Q. Are you aware of any other</p>	<p style="text-align: right;">Page 264</p> <p>1 The same org chart that we looked at before on</p> <p>2 the page ending in 0457.</p> <p>3 A. Are we pulling up the flowchart?</p> <p>4 Is that what you said?</p> <p>5 Q. Yeah, the flowchart.</p> <p>6 A. Okay.</p> <p>7 Q. Okay. And your office of the drug</p> <p>8 unit is housed under the broader investigations</p> <p>9 unit; is that correct?</p> <p>10 A. That's correct.</p> <p>11 Q. And that investigations unit is</p> <p>12 housed under -- reports -- does that report</p> <p>13 directly to the sheriff's office?</p> <p>14 A. I can explain this.</p> <p>15 Q. Yeah, please.</p> <p>16 A. I may not be understanding.</p> <p>17 I report to Inspector Rhoades.</p> <p>18 He's in charge of the investigative division.</p> <p>19 Like, he oversees the detective bureau and the</p> <p>20 drug unit. And then he reports to -- at the</p> <p>21 time this was Major Whitfield, who would report</p> <p>22 to the sheriff.</p> <p>23 You see how it goes up?</p> <p>24 Q. Yes.</p> <p>25 A. Now this Major Whitfield is now a</p>
<p style="text-align: right;">Page 263</p> <p>1 pharmaceutical cases initiated relating to</p> <p>2 pharmaceutical diversion?</p> <p>3 MR. LEDLIE: Object to the form of</p> <p>4 the question.</p> <p>5 A. Again, that's really broad. Are</p> <p>6 you saying within the Summit County Drug Unit</p> <p>7 or anyone attached to the unit?</p> <p>8 Q. I'm asking if you're aware of any</p> <p>9 pharmaceutical diversion cases initiated in the</p> <p>10 Summit County Drug Unit, other than the one</p> <p>11 that's listed here.</p> <p>12 A. No.</p> <p>13 Q. And has the Summit County Sheriff's</p> <p>14 Office initiated any pharmaceutical diversion</p> <p>15 cases other than the one listed here?</p> <p>16 A. The sheriff's office or the drug</p> <p>17 unit?</p> <p>18 Q. The sheriff's office.</p> <p>19 A. Not that I'm aware of. I don't</p> <p>20 know.</p> <p>21 Q. Has the -- well, let me take a step</p> <p>22 back.</p> <p>23 A. Okay.</p> <p>24 Q. Your office -- actually, you can go</p> <p>25 to this org chart. I'm going now to Exhibit 1.</p>	<p style="text-align: right;">Page 265</p> <p>1 chief, so the inspector reports to the chief,</p> <p>2 who reports to the sheriff.</p> <p>3 Q. Understood.</p> <p>4 A. That's -- that's the flow of it.</p> <p>5 Q. That's helpful. Thank you.</p> <p>6 A. Okay.</p> <p>7 Q. Has the Summit County Drug Unit</p> <p>8 ever investigated any doctors for prescribing</p> <p>9 opioids in a way that contributed to the</p> <p>10 opioids crisis?</p> <p>11 MR. LEDLIE: Object to the form of</p> <p>12 the question.</p> <p>13 You can answer.</p> <p>14 A. Not that I'm aware of. In my</p> <p>15 tenure, we have not investigated a doctor.</p> <p>16 Q. And has the Summit County Drug Unit</p> <p>17 ever investigated any manufacturer for</p> <p>18 manufacturing or marketing opioids in a way</p> <p>19 that contributed to the opioids crisis?</p> <p>20 A. Not that I'm aware of.</p> <p>21 Q. Has the Summit County Drug Unit</p> <p>22 ever investigated any distributor for</p> <p>23 distributing opioids in a way that contributed</p> <p>24 to the opioids crisis?</p> <p>25 A. Not that I'm aware of.</p>



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1 Q. Has the sheriff's -- excuse me.  
 2 Has the drug unit ever investigated any  
 3 pharmacy for dispensing opioids in a way that  
 4 contributed to the opioids crisis?  
 5 MR. LEDLIE: Object to the form of  
 6 the question.  
 7 A. Not that I'm aware of.  
 8 Q. Is it fair, then, to say that the  
 9 drug unit hasn't incurred any costs for  
 10 investigating doctors, manufacturers,  
 11 distributors, or pharmacies for any conduct  
 12 contributing to the opioids crisis?  
 13 MR. LEDLIE: Object to the form of  
 14 the question.  
 15 A. Have we incurred any costs relating  
 16 to doctors -- please say it one more time. I'm  
 17 sorry.  
 18 Q. I'm asking is it fair to say that  
 19 the drug unit has not incurred any costs for  
 20 investigating doctors, manufacturers,  
 21 distributors, or pharmacies, for any conduct  
 22 contributing to the opioids crisis?  
 23 A. Well, that's a tough one, because I  
 24 think in the big picture, we have, like, the  
 25 trickle-down effect from prescribing practices

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1 in the state of Ohio, and now we deal with a  
 2 heroin and fentanyl crisis that I would say  
 3 we've incurred expenses.  
 4 Q. But you just testified that the  
 5 drug unit hasn't investigated any of these  
 6 categories that I just described, and if that's  
 7 true, then how could the drug unit incur any  
 8 costs for investigating them if they haven't  
 9 investigated them?  
 10 MR. LEDLIE: Object to the form.  
 11 Asked and answered.  
 12 A. I think I understand where  
 13 you're -- you're -- the basis of your question,  
 14 and I don't think you understand my answer.  
 15 Q. Help me. Explain.  
 16 A. Well, we may not have incurred  
 17 costs relating to investigating a doctor, but  
 18 we're incurring the costs from the aftermath,  
 19 is the best way I could describe it.  
 20 Q. Can you help me understand what you  
 21 mean by "the aftermath"?  
 22 A. The -- I believe the people that  
 23 have transitioned from prescription pills when  
 24 they couldn't afford them to buy cheap,  
 25 inexpensive fentanyl and heroin.

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1 Q. And that's imposed costs on the  
 2 drug unit?  
 3 A. I would say we have costs related  
 4 to heroin investigations and fentanyl  
 5 investigations. But specifically for doctors,  
 6 if that's what you're asking me, no.  
 7 Q. I'm asking you specifically for  
 8 prescription opioids.  
 9 MR. LEDLIE: Object to the form.  
 10 Asked and answered.  
 11 Q. That's fine. I'll move on.  
 12 A. Okay. Okay.  
 13 Q. When did you first recognize that  
 14 there was -- we've referred throughout this  
 15 deposition to an opioid crisis. When did you  
 16 first become aware that there was an opioid  
 17 crisis in -- in Summit County?  
 18 A. I don't know the exact year, but  
 19 when I started in late 2013, prescribing  
 20 practices had started to change. As the  
 21 prescriptions became harder to get, the  
 22 fentanyl became more prev- -- prevalent in our  
 23 community, prevalent.  
 24 Q. What's your basis for saying that  
 25 in late 2013 prescribing practices started to

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1 change?  
 2 A. I read a report. I think it was  
 3 put out by the State Board of Pharmacy, and  
 4 they collected some OARRS data, and it had a  
 5 graph of prescription units dispensed in Summit  
 6 County or state of Ohio.  
 7 Q. And when you say they "started to  
 8 change," how did they -- based on this report  
 9 that you recall reading, how did prescribing  
 10 practices start to change?  
 11 A. Well, there were less  
 12 prescriptions -- less dosage units apparently  
 13 written because there was less pills being  
 14 distributed. When I say distributed, by the  
 15 doctors.  
 16 Q. So I'm going to try to paraphrase,  
 17 and tell me if I'm wrong.  
 18 A. Okay.  
 19 Q. I think what I understand you to be  
 20 saying is that, like, doctors were  
 21 prescribing -- prescribing less prescription  
 22 opioids starting in late 2013? Is that what  
 23 you read?  
 24 A. Possibly late '12, late '13, but,  
 25 yes.

<p style="text-align: right;">Page 270</p> <p>1 Q. And so my original question was</p> <p>2 when did you first become aware that there was</p> <p>3 an opioid crisis in Summit County, and I don't</p> <p>4 think you fully finished that answer.</p> <p>5 A. Well, it may have been later than</p> <p>6 that. It -- you know, it may have been -- I --</p> <p>7 you know, narrow me down on a year here.</p> <p>8 I think we really realized the</p> <p>9 problem in 2016 when we fully understood when</p> <p>10 people were -- that August of '16 when they</p> <p>11 were dying at a very large amount.</p> <p>12 Q. Well, help me understand. You just</p> <p>13 said two diff- -- two very different things.</p> <p>14 First you mentioned late 2012, and now we're in</p> <p>15 August 2016. So I'm trying to understand.</p> <p>16 A. Okay.</p> <p>17 Q. Obviously, you read this report in</p> <p>18 late 2012 about the number of -- the number of</p> <p>19 prescription opioids going down.</p> <p>20 A. Wait. Let me stop you there. I</p> <p>21 didn't read the report in late 2012. This was</p> <p>22 a report, I don't think it was generated until</p> <p>23 2016.</p> <p>24 Q. Okay. Let's -- let's start over.</p> <p>25 A. Okay.</p>	<p style="text-align: right;">Page 272</p> <p>1 You can answer.</p> <p>2 A. Okay. Just various reports I've</p> <p>3 read. It's -- it's pretty -- to me, it looks</p> <p>4 very obvious to see when -- when you see</p> <p>5 prescriptions going down and fentanyl going up</p> <p>6 and deaths spiking, that -- it just felt</p> <p>7 obvious.</p> <p>8 Q. Is drug diversion a problem in</p> <p>9 Summit County?</p> <p>10 A. You're getting into, like, the DEA</p> <p>11 lane. I imagine. There's whole units</p> <p>12 dedicated to drug diversion, so I'm going to</p> <p>13 say yes.</p> <p>14 Q. As your counsel has advised, I</p> <p>15 don't want you to speculate either.</p> <p>16 A. Okay. I'm sorry.</p> <p>17 Q. So when you say "I imagine" --</p> <p>18 A. I'm sorry.</p> <p>19 Q. Okay. I just want to make sure we</p> <p>20 have a --</p> <p>21 A. Yeah.</p> <p>22 Q. -- clear record.</p> <p>23 So you sitting here as -- as a</p> <p>24 commander -- captain and commander of the drug</p> <p>25 unit --</p>
<p style="text-align: right;">Page 271</p> <p>1 Q. Because I think we're -- we're</p> <p>2 saying -- I think I understand what you're</p> <p>3 saying, but I want to make sure the record is</p> <p>4 clear.</p> <p>5 A. Okay.</p> <p>6 Q. When did you first become aware</p> <p>7 that there was an opioid crisis in Summit</p> <p>8 County?</p> <p>9 A. And I'm going to have to answer</p> <p>10 that with I'm not exactly sure, to -- to end</p> <p>11 this right here, because I'm not exactly sure.</p> <p>12 But I know that when the prescriptions went</p> <p>13 down, the illicit drugs went up.</p> <p>14 Q. And are you attributing the</p> <p>15 increase in -- or part of the opioid crisis to</p> <p>16 the decrease in prescription opioids written?</p> <p>17 A. I believe that was a factor.</p> <p>18 Q. Can you explain?</p> <p>19 A. Well, yeah. Just the -- through</p> <p>20 the people I've spoke to and I know personally</p> <p>21 that have been affected by it.</p> <p>22 Q. Do you have any other basis than</p> <p>23 your own personal experience?</p> <p>24 MR. LEDLIE: Object to the form.</p> <p>25 Asked and answered.</p>	<p style="text-align: right;">Page 273</p> <p>1 A. Yes.</p> <p>2 Q. -- from your perspective, is drug</p> <p>3 diversion a problem in Summit County?</p> <p>4 MR. LEDLIE: Object to the form.</p> <p>5 Asked and answered.</p> <p>6 You can answer.</p> <p>7 A. I believe it still is. I'm sorry.</p> <p>8 I said "believe" again, right?</p> <p>9 Yes. How's that?</p> <p>10 Q. And then if that's the case, how do</p> <p>11 you define "diversion"?</p> <p>12 A. Drugs that go outside the normal</p> <p>13 chains of prescribing. Drugs diverted from</p> <p>14 legitimate prescriptions or --</p> <p>15 Q. Have you, through the drug unit,</p> <p>16 developed effective controls against diversion?</p> <p>17 A. Developed effective controls?</p> <p>18 Other than assigning people to those units, no.</p> <p>19 Q. Have you tried to develop effective</p> <p>20 controls against diversion?</p> <p>21 MR. LEDLIE: Object to the form of</p> <p>22 the question.</p> <p>23 A. I guess I'm not understanding the</p> <p>24 question, but I'm going to say we've done --</p> <p>25 when we came across these drugs on the street,</p>

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1 we took them. We assigned somebody to a  
 2 Tactical Diversion Squad. Other than that, I'm  
 3 not sure how to answer you.  
 4 Q. I'll -- I'll ask it a little bit  
 5 differently. Have you done --  
 6 A. Okay.  
 7 Q. Have you undertaken any efforts to  
 8 control diversion of prescription opioids?  
 9 MR. LEDLIE: Object to the form of  
 10 the question.  
 11 A. To control -- to control the what?  
 12 I'm sorry. Say it one more time.  
 13 Q. Have you undertaken any efforts to  
 14 control diversion of prescription opioids?  
 15 MR. LEDLIE: Asked and answered.  
 16 You can answer.  
 17 A. When you're saying control the  
 18 diversion, I guess I'm not understanding what  
 19 you're asking me.  
 20 Q. Before I was asking about effective  
 21 controls against diversion, and so I'm using  
 22 the word "control" in that context. To  
 23 address, to reduce, to eliminate.  
 24 A. Oh, okay. Okay. Thank you.  
 25 Q. Yeah. So let me ask the question

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1 again just so it's clear.  
 2 A. Okay.  
 3 Q. Have you undertaken any efforts to  
 4 reduce or eliminate diversion of prescription  
 5 opioids?  
 6 MS. RION: Objection. Asked and  
 7 answered.  
 8 A. And I'm not sure if I'm answering  
 9 this right, but my -- Carmen Ingram, my -- one  
 10 of my detectives, prepares presentations.  
 11 That's one way of maybe controlling, is  
 12 education. Prepares a -- presentations for the  
 13 DARE -- for Sergeant Mike Walsh to teach in  
 14 DARE.  
 15 So I'm not sure. When you say  
 16 control, maybe with an educational.  
 17 Q. And what's the content of these  
 18 presentations?  
 19 A. I haven't looked at it. I haven't  
 20 looked at it. She's working on it right now.  
 21 But in the past she's done them, and she turns  
 22 them over to DARE, so I haven't reviewed them.  
 23 Q. Do the presentations specifically  
 24 address opioids?  
 25 A. I -- you'd have to ask her. I --

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1 I'm not really sure. It's a drug education,  
 2 drug awareness presentation. I -- I would  
 3 hope.  
 4 Q. Is there anything else that -- any  
 5 other efforts you've undertaken to reduce  
 6 diversion of prescription opioids?  
 7 MR. LEDLIE: Object to the form.  
 8 Asked and answered.  
 9 A. Yeah. I'm not sure.  
 10 Q. That's everything?  
 11 A. Yeah, I guess.  
 12 Q. Have you attempted to determine how  
 13 much of the opioid use in Summit County is  
 14 illegal opioid use?  
 15 A. No.  
 16 Q. Have -- I guess one other question  
 17 is, you walked through a numb- -- you walked  
 18 through some numbers and talked about the  
 19 different equipment and staff that you use and  
 20 that you budget for.  
 21 A. Yes.  
 22 Q. Do you recall that line of --  
 23 A. I do.  
 24 Q. Is it fair to say that if you were  
 25 not investigating opioids, you'd still need the

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1 same staff and the same equipment that you  
 2 currently have?  
 3 MS. RION: Objection. Calls for  
 4 speculation.  
 5 MR. BREWER: You don't need to  
 6 coach. You can just make a form objection.  
 7 MR. LEDLIE: Counselor, that is  
 8 identifying the basis for the form. If you  
 9 don't want that, then we will not provide that.  
 10 But it's perfectly acceptable under the rules  
 11 to let you know why that question is  
 12 objectionable, and that's what we were  
 13 attempting to do, but.  
 14 THE WITNESS: Okay. Ask it again.  
 15 MR. BREWER: Scroll back up.  
 16 Q. Is it fair to say that if you were  
 17 not investigating opioids, you'd still need the  
 18 same staff and the same equipment that you  
 19 currently have?  
 20 MS. RION: The same objection.  
 21 MR. LEDLIE: Object to the form of  
 22 the question.  
 23 A. I don't know.  
 24 MR. BREWER: I have no further  
 25 questions.

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1 MR. BLOCK: Are you all through?

2 MR. LEDLIE: I've got, literally,

3 like, a small amount of questions.

4 Are you -- you got more before?

5 You can go first.

6 MR. BLOCK: No. I'm just coming

7 back up here to --

8 MR. LEDLIE: Okay. It's actually

9 going to be -- you might want to stay put.

10 It's just about the questions you asked about

11 this, but --

12 MR. BREWER: Okay.

13 EXAMINATION OF MATTHEW PAOLINO

14 BY MR. LEDLIE:

15 Q. Exhibit 2, you were asked some

16 questions about the pharmaceutical diversion

17 investigation in Exhibit 2.

18 A. Yes.

19 Q. And I just want to make sure that I

20 understand.

21 This is titled "Ohio Office of

22 Criminal Justice Services Semiannual

23 Performance Report 2012," correct?

24 A. Yes.

25 Q. And so when you're identifying that

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1 this is the one that you're familiar with from

2 this time period, is your answer limited to

3 this particular time period, or are you saying

4 that that's the only diversion investigation

5 that's ever happened within the Summit County

6 Drug Unit or its affiliated offices?

7 MR. BLOCK: Objection to form.

8 A. I'm not saying this is the only

9 case of diversion, if that's what you're asking

10 me.

11 Q. That's what I was asking.

12 A. Okay.

13 Q. And -- and your answers were --

14 were limited to the time period covered in this

15 report; is that correct?

16 MR. BLOCK: Object to the form.

17 MR. LEDLIE: I understand.

18 A. Yes.

19 MR. BREWER: I do want to come back

20 for a second.

21 THE WITNESS: Okay. Come on back.

22 EXAMINATION OF MATTHEW PAOLINO

23 BY MR. BREWER:

24 Q. This is Matt Brewer again. Hi.

25 A. Hi, Matt.

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1 Q. Sitting here today, can you recall

2 any other instances of investigation of a

3 pharmaceutical diversion case, other than the

4 one that's mentioned -- that we discussed in

5 Exhibit 2?

6 A. When you say "pharmaceutical

7 diversion," are you just meaning pills that

8 were diverted from the normal chain, or are you

9 talking about a pharmacy? Just break it down

10 for me.

11 Q. Sure. Let's do both.

12 A. Okay.

13 Q. Sitting here today, can you recall

14 any instance of pills being diverted from the

15 normal chain?

16 A. We have purchased -- made

17 purchases, controlled purchases, of pills, yes.

18 Q. Sitting here today, can you recall

19 any instance of prescription drugs being

20 diverted and -- and having cases initiated?

21 A. It's the same question, I -- I feel

22 like. We have made undercover purchases of

23 pills.

24 Q. From pharmacies?

25 A. Oh, not from pharmacies. No. I'm

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1 sorry. I misunderstood.

2 Q. So let me -- I'll -- I'll ask it

3 again.

4 Earlier we talked about, in

5 Exhibit 2, this one instance of a

6 pharmaceutical case initiated. Do you recall

7 that?

8 A. Yeah.

9 Q. And are you aware of any other

10 pharmaceutical cases initiated, other than the

11 one listed here?

12 MR. LEDLIE: Object to the form of

13 the question.

14 A. And I'm sorry. I'm going to have

15 to ask you to clarify again. Are you talking

16 about a pharmacy or just the pharmaceuticals,

17 the -- the -- the pills?

18 Q. I'm referring to any pharmaceutical

19 cases initiated involving pharmacies.

20 A. No.

21 Q. Ever?

22 A. With the Summ- -- in my tenure with

23 the Summit County Drug Unit, no.

24 MR. BREWER: Okay. Thank you.

25 THE WITNESS: Okay.

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1 MR. BLOCK: We're -- we're good,  
 2 right?  
 3 So I was just going to say thank  
 4 you, Mr. Paolino, for your time. This is all  
 5 the questions we have.  
 6 THE WITNESS: Okay.  
 7 MR. BLOCK: Now, so done, with the  
 8 caveat that if there are additional documents  
 9 produced after this deposition that would be  
 10 relevant to questioning for Captain Paolino, we  
 11 reserve the right to come back and ask  
 12 questions about those.  
 13 MR. LEDLIE: Understood. And  
 14 subject to the Court's ruling on any such  
 15 request, we would oppose it, but we'll see.  
 16 But thank you, everyone, for today.  
 17 MR. BLOCK: Thank you very much.  
 18 THE WITNESS: Thank you.  
 19 THE VIDEOGRAPHER: Off the record  
 20 at 3:25 p.m.  
 21 Deposition concluded at 3:25 p.m.)  
 22 ~ ~ ~ ~ ~  
 23  
 24  
 25


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1 Whereupon, counsel was requested to give  
 2 instructions regarding the witness's review of  
 3 the transcript pursuant to the Civil Rules.  
 4  
 5 SIGNATURE:  
 6 Transcript review was requested pursuant to the  
 7 applicable Rules of Civil Procedure.  
 8  
 9 TRANSCRIPT DELIVERY:  
 10 Counsel was requested to give instructions  
 11 regarding delivery date of transcript.  
 12  
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1 REPORTER'S CERTIFICATE  
 2 The State of Ohio, )  
 3 SS:  
 4 County of Cuyahoga. )  
 5  
 6 I, Stephen J. DeBacco, a Notary  
 7 Public within and for the State of Ohio, duly  
 8 commissioned and qualified, do hereby certify  
 9 that the within named witness, MATTHEW PAOLINO,  
 10 was by me first duly sworn to testify the  
 11 truth, the whole truth and nothing but the  
 12 truth in the cause aforesaid; that the  
 13 testimony then given by the above-referenced  
 14 witness was by me reduced to stenotypy in the  
 15 presence of said witness; afterwards  
 16 transcribed, and that the foregoing is a true  
 17 and correct transcription of the testimony so  
 18 given by the above-referenced witness.  
 19 I do further certify that this  
 20 deposition was taken at the time and place in  
 21 the foregoing caption specified and was  
 22 completed without adjournment.  
 23  
 24  
 25

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1 I do further certify that I am not  
 2 a relative, counsel or attorney for either  
 3 party, or otherwise interested in the event of  
 4 this action.  
 5 IN WITNESS WHEREOF, I have hereunto  
 6 set my hand and affixed my seal of office at  
 7 Cleveland, Ohio, on this 10th day of  
 8 December, 2018.  
 9  
 10  
 11  
 12   
 13  
 14 Stephen J. DeBacco, Notary Public  
 15 within and for the State of Ohio  
 16  
 17 My commission expires September 30, 2022.  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25



<p style="text-align: right;">Page 286</p> <p>1 Veritext Legal Solutions 1100 Superior Ave 2 Suite 1820 3 Cleveland, Ohio 44114 4 Phone: 216-523-1313 5 6 December 10, 2018 7 To: James W. Ledlie 8 9 Case Name: In Re: National Prescription Opiate Litigation v. 10 Veritext Reference Number: 3128034 11 12 Witness: Matthew Paolino Deposition Date: 12/5/2018 13 14 Dear Sir/Madam: 15 16 Enclosed please find a deposition transcript. Please have the witness 17 review the transcript and note any changes or corrections on the 18 included errata sheet, indicating the page, line number, change, and 19 the reason for the change. Have the witness' signature notarized and 20 forward the completed page(s) back to us at the Production address 21 shown 22 above, or email to production-midwest@veritext.com. 23 24 If the errata is not returned within thirty days of your receipt of 25 this letter, the reading and signing will be deemed waived. 26 27 Sincerely, 28 Production Department 29 30 NO NOTARY REQUIRED IN CA</p>	<p style="text-align: right;">Page 288</p> <p>1 DEPOSITION REVIEW 2 CERTIFICATION OF WITNESS 3 4 ASSIGNMENT REFERENCE NO: 3128034 5 CASE NAME: In Re: National Prescription Opiate Litigation v. 6 DATE OF DEPOSITION: 12/5/2018 7 WITNESS' NAME: Matthew Paolino 8 In accordance with the Rules of Civil 9 Procedure, I have read the entire transcript of 10 my testimony or it has been read to me. 11 I have listed my changes on the attached 12 Errata Sheet, listing page and line numbers as 13 well as the reason(s) for the change(s). 14 I request that these changes be entered 15 as part of the record of my testimony. 16 17 I have executed the Errata Sheet, as well 18 as this Certificate, and request and authorize 19 that both be appended to the transcript of my 20 testimony and be incorporated therein. 21 22 Date _____ Matthew Paolino 23 24 Sworn to and subscribed before me, a 25 Notary Public in and for the State and County, the referenced witness did personally appear and acknowledge that: They have read the transcript; They have listed all of their corrections in the appended Errata Sheet; They signed the foregoing Sworn Statement; and Their execution of this Statement is of their free act and deed. I have affixed my name and official seal this _____ day of _____, 20____. _____ Notary Public _____ Commission Expiration Date</p>
<p style="text-align: right;">Page 287</p> <p>1 DEPOSITION REVIEW 2 CERTIFICATION OF WITNESS 3 4 ASSIGNMENT REFERENCE NO: 3128034 5 CASE NAME: In Re: National Prescription Opiate Litigation v. 6 DATE OF DEPOSITION: 12/5/2018 7 WITNESS' NAME: Matthew Paolino 8 In accordance with the Rules of Civil 9 Procedure, I have read the entire transcript of 10 my testimony or it has been read to me. 11 I have made no changes to the testimony 12 as transcribed by the court reporter. 13 14 Date _____ Matthew Paolino 15 Sworn to and subscribed before me, a 16 Notary Public in and for the State and County, 17 the referenced witness did personally appear 18 and acknowledge that: 19 They have read the transcript; 20 They signed the foregoing Sworn 21 Statement; and 22 Their execution of this Statement is of 23 their free act and deed. 24 25 I have affixed my name and official seal 26 this _____ day of _____, 20____. 27 28 _____ 29 Notary Public 30 _____ 31 Commission Expiration Date 32 33 34 35</p>	<p style="text-align: right;">Page 289</p> <p>1 ERRATA SHEET 2 VERITEXT LEGAL SOLUTIONS MIDWEST 3 ASSIGNMENT NO: 12/5/2018 4 PAGE/LINE(S) / CHANGE /REASON 5 _____ 6 _____ 7 _____ 8 _____ 9 _____ 10 _____ 11 _____ 12 _____ 13 _____ 14 _____ 15 _____ 16 _____ 17 _____ 18 _____ 19 _____ 20 Date _____ Matthew Paolino 21 SUBSCRIBED AND SWORN TO BEFORE ME THIS _____ 22 DAY OF _____, 20____. 23 _____ 24 Notary Public 25 _____ Commission Expiration Date</p>

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF SEPTEMBER 1, 2016. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS  
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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